

Section 3.1

LAND USE / RELATIONSHIP TO PLANS & POLICIES

3.1.1 Affected Environment

2020 / 2021 SEIS & Revised Proposal

The Bullfrog UGA Master Site Plan and Development Agreement included 1,100-acres owned by Trendwest at the time of approval, and subsequently owned by their successors in interest, Suncadia and New Suncadia. The SEIS described the existing land use conditions on and in the vicinity of the Bullfrog UGA properties (see Draft SEIS Section 3.6 for details). Selected information from the Draft SEIS is provided and compared in context below; please consult the SEIS document for more detailed information.

Approximately 174 acres of the Bullfrog UGA property has been dedicated to public agencies including 38-acres to the School District, 112 acres to the city for lease to the Washington State Horse Park, 12-acres to the city for the Water Treatment Plant, and most recently 12-acres to the city for the development of a community recreation facility. Sun Communities then acquired the balance of this property in 2021, with the exception of approximately one-acre used for utilities, retained by New Suncadia.

The property now owned Sun Communities, also known as the 47° North site, is largely vacant and undeveloped, and generally comprised of vegetated/forested areas. Horseback riding, hiking, and snowmobiling occur on dirt roads throughout the site; easements are in place for authorized use of the site and certain trails by the adjacent Horse Park. Equestrian facilities, such as a small building, parking area, and load/unload areas, are also located onsite. Puget Sound Energy and Bonneville Power Administration electrical transmission lines/easements traverse the site; other utility easements are present as well.

3.1.2 Impacts

2020 / 2021 SEIS

As described in the SEIS, development of the 47° North site under SEIS Alternative 6 or Alternative 5 would result in the conversion of a vacant, undeveloped, vegetated/forested site into a mix of urban land uses. Development of SEIS Alternative 6 would be less intensive than SEIS Alternative 5: fewer housing units would be developed; 25 acres/150,000 square feet of retail could be developed by another property owner, compared to 75 acres/950,000 square feet of business park and up to 10 acres of retail; and more undeveloped open space would be retained.

The range of proposed land uses and their densities with either SEIS Alternative 5 or 6 would result in increases in activity levels and potential land use incompatibilities, which can result from more intensive land uses. Proposed development would represent a continuation of the existing trend of intensifying development in the area (e.g., Suncadia Master Planned Resort, City Heights, and Cle Elum Pines developments). Land use conflicts were not anticipated to be significant under SEIS Alternative 6 due to the proposed layout of land uses, proposed open space and buffers incorporated into the site plan, and existing physical barriers within and adjacent to the site.

The anticipated land use impacts under SEIS Alternative 6 are discussed further below in comparison to the Revised Proposal.

Revised Proposal

Development with the Revised Proposal would be almost identical to SEIS Alternative 6, including the types, amounts and distribution of land uses on the site and resulting impacts. Like SEIS Alternative 6 and Alternative 5, the Revised Proposal would change the land use character of the 47° North site to a large mixed-use, master planned development. Please refer to **Table 2-1** for a summary of the proposed land uses under the Revised Proposal and SEIS Alternative 6, and **Figure 2-4** for the Revised Proposal Master Site Plan. The amount and intensity of development would be less compared to SEIS Alternative 5.

Proposed changes to the Revised Proposal compared to SEIS Alternatives 6 are identified in **Chapter 2** of this Addendum and are not expected to substantially change land use impacts identified in the SEIS. Any differences in impacts between SEIS Alternative 6 and the Revised Proposal that would result from the modification in land uses or timing of development were previously discussed and are considered minor and insignificant.

As under SEIS Alternative 6, development under the Revised Proposal would represent a transition of the 47° North site from a vacant, largely undeveloped, forested site to more intense urban land uses, consistent with the site's current designation as a UGA and the approved Master Site Plan.

As noted in **Table 2-1**, the Revised Proposal would feature a mix of land uses similar to those under SEIS Alternative 6 but would also incorporate 50 affordable housing units, which would be dispersed in the site's multi-family areas. Under either SEIS Alternative 5 or 6, a parcel adjacent to the Horse Park (6.8 or 7.5 acres, respectively) would be dedicated to the city for the development of 50 units of affordable housing by others. Under the Revised Proposal, this area would be retained as open space and the affordable housing units would be constructed and integrated into the overall development by Sun Communities.

The revised Master Site Plan included in the Revised Proposal includes a number of other small changes that would not affect the analysis of land use impacts. The layout of

residential uses relative to SEIS Alternative 6 has been modified somewhat. Under the Revised Proposal, multi-family rather than single family housing would be located adjacent to the commercial center. This change would result in greater compatibility between the residential and commercial uses, as the multi-family housing would be a more intensive use. The mix of commercial uses would also be somewhat different, but the overall amount of commercial uses (150,000 square feet) and resulting impacts would be the same (see **Table 2-2** for a comparison of the commercial uses under the Revised Proposal and SEIS Alternative 6).

The Revised Proposal includes a net increase in the amount of open space compared to SEIS Alternative 6 (approximately 77 acres more), and a greater percentage of the overall site devoted to open space compared to Alternative 5 (58% versus 48%). The preservation of more of the site in natural open space, predominately in the southern part of the site, would provide more buffering to adjacent uses (e.g., the Horse Park). The additional open space would also be more consistent with the Mountain-to-Sound Greenway recommendation that new development be designed for maximum preservation of the natural forested character of the lands, scenic qualities, and wildlife habitat.

As for SEIS Alternative 6, it is assumed that adopted development regulations, and mitigation measures adopted as conditions of approval, would minimize potential land use incompatibility impacts onsite and between the site and adjacent areas. As a result, no new significant adverse land use impacts are anticipated with the Revised Proposal.

Indirect and Cumulative Impacts

Indirect impacts under the Revised Proposal would be similar to those described for SEIS Alternative 6 and would include additional demand for goods and services due to the increase in onsite population with a potential to spur spin off commercial development (e.g., in the Cities of Cle Elum and Roslyn, and Town of South Cle Elum). Commercial development, which is now part of the project under the Revised Proposal, could capture a portion of the demand for these types uses from the 47° North development which would reduce the demand and indirect pressure for development elsewhere in the City of Cle Elum and other adjacent municipalities. The development of new retail opportunities within the boundaries of the Master Site Plan, including a new grocery store, could reduce congestion in the vicinity of the Safeway Store, and reduce the number of new trips that would be created.

Cumulative land use impacts would also be similar to SEIS Alternative 6. Development of the Revised Proposal combined with existing and known future development in the area would increase the total developed area and associated housing and population in Kittitas County and City of Cle Elum and represent a conversion and intensification of land use in the area. Cumulative development and associated cumulative population growth would increase activity levels and create additional demand for goods and services that could encourage spin-off development in the city and nearby urban areas, similar to SEIS Alternative 6.

3.1.3 Mitigation Measures

No new significant adverse impacts on land use would occur from the Revised Proposal and no additional mitigation measures are recommended. The mitigation measures identified below include those measures that have been updated for the Revised Proposal from those listed in the Final SEIS. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

Proposed Mitigation Measures (Included in the Project)

- Approximately 477 acres (58% of the site) should be retained in open space, including critical areas such as the Cle Elum River, wetlands, and steep slopes. A total of approximately 553 acres of open space (62% of the site) would be part of the project, including undeveloped open space (such as community/ recreation open space, stormwater open space, and steep slope areas and their buffers), wetlands and their buffers, and the powerline right-of-way. Existing easements are in place to protect the River Corridor Open Space and Managed Open Space in the western portion of the site. These easements would be retained by New Suncadia or transferred to the Applicant (Sun Communities).

Required Mitigation Measures

- Development of the commercial center would maintain the 50-foot-wide platted buffer adjacent to the SR 903 right of way. ~~would be maintained with possible commercial development on the adjacent 25-acre property.~~

Approved Bullfrog Flats Conditions of Approval (Not Included in the Project)

- Note: The Bullfrog Flats approval required conveyance of a useable area of 7.5 acres to the City of Cle Elum, or another public or non-profit entity approved by the City, for development of a minimum of 50 affordable housing units. The 50 housing units were not counted towards the 1,334-unit cap for the Bullfrog Flats project. The parcel or parcels were required to be identified and conveyed prior to approval of the 250th residential housing unit. The Revised Proposal includes development and dispersal of 50 affordable housing units within the project in lieu of dedication of land. The existing condition would be deleted or modified.
- Note: A current development condition applicable to the Bullfrog Flats site only permits small-scale retail uses that would serve the convenience needs of residents and employees to be included on the commercial site. Retail uses would be limited to 10% of the floor area of the commercial development, and no individual retail use would contain over 5,000 sq. ft. Primary entrance to the retail uses would not be allowed from SR 903 or Bullfrog Road. The approved Bullfrog Flats project also includes 75 acres/950,000 sq. ft. of business park uses. The Revised Proposal includes an approximate 150,000-square foot commercial center (retail, restaurant and office uses)

on a 25-acre site with vehicle access from SR 903, and no business park uses. Approval would require modification or elimination of the current limitations.

3.1.4 Relationship to Plans and Policies

The SEIS discussed the relationship of SEIS Alternative 6 to relevant land use plans, policies, and regulations of Washington State, Kittitas County, City of Cle Elum, and neighboring cities/towns (i.e., the City of Roslyn and the Town of South Cle Elum) (see Draft SEIS Section 3.7 for details). As noted in this section and **Chapter 2**, the Revised Proposal is almost identical to SEIS Alternative 6, including the types and breakdowns of land uses, and the distribution of land uses on the site. However, there are some noted changes with the Revised Proposal, including: the inclusion of 50 affordable housing units; the inclusion of the 25-acre commercial property in the project area to be developed by Sun Communities; the addition of 78 acres of undeveloped open space; and a different development phasing plan (see **Table 2-1** for a summary comparison of land uses under SEIS Alternative 6 and the Revised Proposal). Due to the similarities in types, amounts, and layout of land uses on the site, it is anticipated that the Revised Proposal would be similarly consistent with relevant plans and policies as SEIS Alternative 6.

One significant change between the Revised Proposal and SEIS Alternative 6 is the construction, integration, and dispersal of 50 units of affordable housing into the project area to be developed by Sun Communities, rather than dedication of a site to the city for future development of 50 units of affordable housing by others. This is consistent with the provision in the Development Agreement giving preference to the dispersal of these units. This change would also enhance the consistency and compatibility of the Revised Proposal with applicable housing-related policies for the City of Cle Elum, including: the following

GOAL H-1 The City of Cle Elum includes a diverse mix of housing types that meets the needs and are affordable to all segments of its population, especially low and moderate-income households. The range of housing types also reflect market conditions, the City's rural setting, and small-town character.

Policy H-1.6 Promote the production of housing affordable for all incomes, through a mix of housing types, models, and densities throughout the City, including: small lot single family detached, zero lot line, attached housing, accessory units, cluster housing, cottages, duplexes, townhouses, and apartments, as well as manufactured housing units, that are compatible with the neighborhoods in which they are located.

Policy H-1.9 Require new multi-family or mixed-use projects involving 20 dwelling units or more to provide affordable dwelling units as part of the project.

Please consult Section 3.3, **Housing, Population, and Employment** of this Addendum for additional information about housing types and cost.

The Revised Proposal would also integrate the 25-acre commercial property into the project area to be developed by Sun Communities. The original Master Site Plan included a 75-acre business park, with limited provisions for commercial uses (a maximum of 10 acres). SEIS Alternative 6 assumed that the restrictions on commercial uses would be removed, the size of the area reduced to 25 acres, and that New Suncadia would retain ownership and develop this area separate from the balance of the project area. The integration of the commercial property into the Revised Proposal and its connection to residential uses via proposed trails and walkways would be consistent with relevant plans, policies, and zoning for the Planned Mixed Use (PMU) zone, including the following:

Policy LU-5.1 Assure that a broad and diverse range of products and services are available to the residents of the City of Cle Elum.

CEMC 17.45.010.A.1 To assure that large new development creates a complete and interdependent Cle Elum community that contains a mix of land uses that provides for most of the daily needs of its residences and visitors including recreation, employment, housing affordable to all residents, and education.

CEMC 17.45.010.A.2 To obtain development within the City with imaginative site planning in a compatible mixture of land uses that will encourage pedestrian rather than automotive access to employment opportunities and goods and services.

It is noted, however, the PMU zoning applicable to the site (CEMC 17.45.050.A) indicates that “*retail and service uses shall be limited to those convenience retail and service uses that are sized and designed to serve the residents or employees of the PMU zone....*”. Commercial uses in the Revised Proposal include a mix of grocery store, retail, restaurant, and office uses. These types of uses would serve the residents and employees of 47° North but would also provide a broader mix and greater amount of retail, service, and office uses that would also serve residents of Cle Elum and other nearby cities/towns. The City Council will determine, during its review of the proposed major amendment to the Master Site Plan and the Development Agreement, whether this element of the Revised Proposal meets the intent of applicable zoning provisions and serves the public interest.