

## **Section 3.7 PUBLIC SERVICES**

### **3.7.1 Affected Environment**

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#### **2020 / 2021 SEIS**

The SEIS described the existing public services conditions (i.e., police, fire protection, hospital and emergency medical, emergency dispatch, and school services) in the vicinity of the 47° North site at that time (see Draft SEIS Section 3.12 for details). Selected information from the Draft SEIS is provided and compared in context below; please consult the SEIS document for more detailed information.

#### **Revised Proposal**

##### **Police Service**

In the last two City of Cle Elum budget cycles, the Police Department proposed staffing increases – calculated using the International City/County Management Association (ICMA) method – to address understaffing, and the city has authorized their requests. In the 2023 budget, the city funded two new officers per shift, which contributes to an addition of four new officers since 2020 and a current total of 12 officers (*Cle Elum-Roslyn-South Cle Elum Police Department, 2022*).<sup>1</sup>

##### **Fire Protection Service**

No new information was provided by the Fire Department for this Addendum. Therefore, the existing conditions information from the SEIS is used for this analysis.

##### **Hospital & Emergency Medical Service**

Kittitas County is served by two hospital districts. Hospital District No. 1 operates a full-service critical access hospital in Ellensburg. Hospital District No. 2 operates Medic One ambulance service and maintains a medical clinic in Cle Elum.

##### **Kittitas Valley Hospital District No. 1**

Hospital District No. 1 provided updated information on staffing levels and other projected needs for their services in the future, and this information indicates that staffing levels for Hospital District No. 1 have decreased since 2019. This reduction has not been intentional but is due to several extraneous factors, including retirements, and could be transitory. To provide a more conservative estimate of impacts, the analysis in this Addendum continues to use the prior, higher staffing levels identified in the SEIS to estimate population-based demand for the Revised Proposal.

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<sup>1</sup> Later in 2023, the City of South Cle Elum will begin contracting for police service with Kittitas County and the city department will be renamed the Cle Elum-Roslyn Police Department. This change will incrementally reduce the population served by the department and will in effect increase the existing level of service as measured by population.

Hospital District No. 1 does not have an adopted level of service but provided information regarding various population estimates and ratios of staff-to-population that could be used to identify service demand. (*Hospital District No. 1/Kittitas Valley Healthcare, 2022*). The 2020 census data generally shows that Kittitas County has significantly higher population-to-provider ratios than the state as a whole (i.e., it provides a lower effective level of service and has an existing service deficiency). The provided data also notes that Washington State has the fewest primary care providers per 100,000 residents of any state in the nation, which also suggests a present deficiency relative to other states. Hospital District No. 1 calculated the staff, using the current Washington State ratios, needed to meet the demands of the current County population (less than 50,000) and a future County population of 70,000. **Table 3.7-4**, later in this section, presents the alternative staffing needs based on the 50,000 population. A portion of the demand embodied in this calculation reflects an existing deficiency, however, which cannot be attributed to a proposed project according to long-standing SEPA policy.

Projected staffing needs based on a future 70,000 population have not been calculated, however, for several reasons. First, the Washington State Office of Financial Management (OFM) projects population only as far as 2050; based on OFM's forecast growth rates, Kittitas County would not reach a population of 70,000 until approximately 2070. Calculating health care demands beyond 2050 would be extremely speculative. In addition, the Revised Proposal would be built out in 2031, and any additional growth and service impacts beyond that date would not be attributable to 47<sup>o</sup> North; its pro rata share of need would also decrease as the population base increased. In addition, extending the time horizon and using it to establish a hypothetical level of service would serve to carry forward and exacerbate the Hospital District's existing staffing deficiency. As noted previously, Hospital District 1 has not adopted a level of service standard and using an unadopted standard based on a projection of future population would merely identify a hypothetical need that is not attributable to the proposal.

Hospital District No. 1 also documented current costs and revenues to the District overall, noting that its costs are rising and revenues do not cover all costs. This situation is unfortunately common for many special purpose districts in Washington State, due to limited taxing authority, levy lids, etc. As noted in the Fiscal Conditions analysis discussion in the SEIS and this Addendum, however, hospital districts also rely primarily on charges for service, including insurance reimbursements, to generate the majority of their revenue. Based on 2021 data submitted by the District to the State Department of Health, Hospital District 1 receives more than 96% of its revenues from patient charges and a very minor amount from tax revenues. The District has the flexibility to increase service charges to address rising costs.

## Kittitas Valley Hospital District No. 2

Hospital District No. 2, which serves the Suncadia Master Planned Resort and unincorporated area surrounding Cle Elum as well as the City, supplied updated information on calls for emergency medical service from 2016 to 2022. This data shows that call volumes to Hospital District No. 2 have remained relatively constant over the past seven years with an average of 1,410 calls per year. A breakdown of the distribution of calls for the most recent year (2022) indicates that approximately 30% of the calls to Hospital District No. 2 were for emergency medical service within the City of Cle Elum and the remaining 70% of the calls were for service from locations outside of the City, i.e., unincorporated Kittitas County and other cities. See **Appendix D** for details on calls to Hospital District No. 2. Therefore, most of the calls to Hospital District No. 2 are from outside the City of Cle Elum. The distribution of calls received from permanent residents versus those from recreational visitors is unknown. However, calls associated with recreational visitors are included within the service call total, whether within or outside the City. In addition, approximately one-half of the housing within the zip code that corresponds to the Hospital District 2 service area/taxing boundary are occupied seasonally (<https://www.unitedstateszipcodes.org/98922/#stats>).

### **Emergency Dispatch**

Updated staffing information was provided by KITTCOM for this analysis. KITTCOM is currently authorized for 15 full-time emergency dispatchers (*KITTCOM, 2022*).

### **Schools**

The Cle Elum-Roslyn School District provided updated enrollment history and enrollment projection information, including student generation rates for single family and multi-family residences. Student enrollment in October 2022 was approximately 935 students. **Table 3.7-1** summarizes enrollment projections for the School District through 2032. These projections include assumptions for the 47<sup>o</sup> North project (including the addition of affordable housing units) as well as other known development that is anticipated to occur within the School District (e.g., the Suncadia Master Planned Resort and the City Heights project).

**Table 3.7-1  
CLE ELUM-ROSLYN SCHOOL DISTRICT  
STUDENT ENROLLMENT PROJECTIONS**

Grade	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
K-5	423	446	475	516	553	570	575	581	589	594	596
6-8	237	221	209	206	228	257	301	328	341	342	349
9-12	275	300	322	323	317	310	304	320	354	397	439
<b>Total Students</b>	<b>935</b>	<b>967</b>	<b>1,006</b>	<b>1,045</b>	<b>1,098</b>	<b>1,137</b>	<b>1,180</b>	<b>1,229</b>	<b>1,284</b>	<b>1,333</b>	<b>1,384</b>

*Source: Cle Elum-Roslyn School District and Educational Data Solutions, 2022.*

Based on existing School District facility capacity information that was identified in the SEIS (i.e., capacity for approximately 970 students), it is anticipated that the projected enrollment identified in **Table 3.7-1** would exceed the district's existing facility capacity by 2024. As part of the district's planning and projections, they anticipate the need to develop an Early Childhood Learning Center (ELC) in the future. The ELC could include between 8 and 10 classrooms and auxiliary spaces like offices, conference rooms, and space for support programs (e.g., for physical therapy, occupational therapy, and speech). The current plan is to include preschool, transitional kindergarten, Early Childhood and Assistance Program (E-Cap), and Kindergarten. The district is in the early stages of planning for this facility.

Current student generation rates identified by the School District are 0.4 students per single family residence and 0.1 students per multi-family residence (*Cle Elum-Roslyn School District, 2022*), which is slightly higher than the average student generation rate used in the SEIS (0.25 per household) and reflects a greater number of students from the Suncadia Master Planned Resort and other development than originally projected.

### **3.7.2 Impacts**

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#### **2020 / 2021 SEIS**

The SEIS evaluated additional demand for public services (police service, fire protection, hospital and emergency medical, emergency dispatch, and public schools) associated with construction and operation of SEIS Alternatives 5 and 6. The SEIS analyzed operational impacts based on population, as it is commonly assumed that population would be the primary generator of service demand. For purposes of analysis, it was generally assumed that staffing needs would increase in direct proportion with population increases using current ratios of staff-to-population. Use of de facto population-based LOS standards are commonly applied in environmental documents to estimate service demands in jurisdictions that have not adopted a formal LOS standard. An alternate method of assessing impacts on police service (the ICMA method) prepared by the Cle Elum-Roslyn-South Cle Elum Police Department was also presented in the SEIS.

Overall, using population-based standards and including a proxy population for RV resort sites, the SEIS concluded that Alternative 6 would generate less demand for services compared to Alternative 5 (see **Table 3.7-2**, footnote 4 for an explanation of the RV population used for the analysis). However, as discussed further below, the use of a proxy population to estimate transient demand from RV visitors may be overly conservative and may overstate probable demand. As noted previously, the Cle Elum area is a popular recreational destination and demand associated with transient recreational visitors is already reflected in historic local demand for various services. Attributing a separate proxy population to RV sites may, therefore, reflect double counting and be overly conservative. Alternative de facto levels of service using local data (e.g., number of calls experienced

historically rather than an assumed population) are also discussed in the analysis where more specific information is available.

## Revised Proposal

As in the SEIS, the analysis of public service impacts of the Revised Proposal is generally based on population, and it is assumed that project-related population would be the primary generator of additional service demand. As mentioned above, this method is a generally accepted approach to estimating service impacts in the absence of adopted quantitative levels of service standards, as is the case for all service providers considered here. An alternative method for calculating police service demand recommended by the Cle Elum Police Department, is also considered in the SEIS and this Addendum. Additional data that bears on demand and alternative estimates are also discussed where local historical data is available.

It is noted that assuming a continuing linear increase in demand and staffing in proportion to population increases may not be an accurate predictor of future needs. For example, this methodology does not account for economies of scale that are present in many organizations and allows them to accommodate some amount of increased demand without increasing staff. While it is appropriate to take a conservative approach to estimating demand for purposes of analysis, it is also appropriate to consider other data that bears on demand, along with methods that can be applied to measure project performance and actual post-development demand.

**Table 3.7-2** provides a breakdown of the proposed residential units and associated permanent population under SEIS Alternative 6 and the Revised Proposal; SEIS Alternative 5 is also noted for comparison purposes. An equivalent or proxy population is calculated for the RV sites and included in the total population used to calculate potential public service demands that would be generated by the RV component of SEIS Alternative 6 and the Revised Proposal. The calculation of service demand uses a staff-to-population ratio that accounts for potential calls from non-residents (including university students), recreational visitors and part-time residents. These population groups currently and historically comprise a sizable portion of the total area-wide population and create some proportion of demand for various services; this proportion is not separately tracked or estimated by service providers, however. To the extent such service demand is already accounted for in the staff-to-population ratios used by the various service purveyors to determine staffing needs (i.e., it is already implicitly included in the number of calls for service that inform a service provider's level of service and its existing ratio or staff-to-population), the proxy population likely results in some amount of double counting and resulting calculations may be overly conservative. Equating transient RV visitors to some proportion of permanent residential population may overstate future demand. For example, as shown in **Table 3.7-2**, the RV proxy population metric used to estimate demand for the Revised Proposal and SEIS

Alternative 6 adds approximately 39% to the total population that is used to estimate service demand and a proportional increase in the staff required to meet the demand. Eliminating or modifying the RV proxy population metric would reduce the estimates of service needs by some factor.

**Table 3.7-2  
RESIDENTIAL POPULATION –  
SEIS ALTERNATIVES 5 and 6, & REVISED PROPOSAL (2031)**

Alternative	Permanent Residential Units	Residents / Household	Occupancy Rate	New Residents	RV Sites	RV Proxy Population	Total Resident/ RV Population
SEIS Alternative 5	1,334	2.34 <sup>1</sup>	90% <sup>1</sup>	2,809	0	0	2,809
SEIS Alternative 6	707	2.34 <sup>1</sup>	90% <sup>1</sup>	1,489	627	941 <sup>4</sup>	2,430
Revised Proposal	757 <sup>3</sup>	2.37 <sup>2</sup>	88% <sup>2</sup>	1,579 <sup>3</sup>	627	941 <sup>4</sup>	2,520
Revised Proposal w/o Affordable Housing	707 <sup>3</sup>	2.37 <sup>2</sup>	88% <sup>2</sup>	1,475 <sup>3</sup>	627	941 <sup>4</sup>	2,416

**Source: 2020/2021 SEIS, Sun Communities, 2022.**

- <sup>1</sup> Household sizes and occupancy rates for SEIS Alternatives 5 and 6 are based on the *U.S. Census Bureau, 2014-2018, American Community Survey, 5-Year Estimates*.
- <sup>2</sup> Household sizes and occupancy rates for the Revised Proposal are based on the *U.S. Census Bureau, 2016-2020, American Community Survey, 5-Year Estimates*.
- <sup>3</sup> The permanent residential units and associated residents are those at buildout of the entire Revised Proposal in 2031.
- <sup>4</sup> The proxy population calculated for the RV sites is based on 627 sites, an assumed average RV resort occupancy of 50%, and three people per site, based on data provided by the Applicant reflecting occupancy at other projects throughout the U.S.

**Table 3.7-3** compares the public service demands from operation of SEIS Alternatives 5 and 6 with those from the Revised Proposal. Details about the public services demands from the Revised Proposal are described below. The specific impacts of the Revised Proposal and SEIS Alternative 6 are substantially similar using de facto population-based level of service ratios. Alternative 5 would generate greater demand for public services overall due to its larger population.

### *Police Service*

New residents and RV site visitor population during operation of the Revised Proposal would generate increased demand for police service, including new calls for service from the site. New calls and increased demand for police service would create an increased need for additional officers to serve new residents. Based on the updated, higher Police Department staffing levels and using a population-based standard (12 officers per 3,775 population), the Revised Proposal at buildout would generate a greater need for additional officers than SEIS Alternative 6 but less than SEIS Alternative 5 in 2031 (see **Table 3.7-3**). The small increase in demand for SEIS Alternative 6 is primarily attributable to the City’s recently increased staffing level. The additional affordable housing units in the Revised Proposal comprise approximately 4% of the increase and in itself this is not considered a significant difference from SEIS Alternative 6 or a significant impact.

**Table 3.7-3  
PUBLIC SERVICE DEMANDS –  
SEIS ALTERNATIVE 5, 6, & REVISED PROPOSAL (2031)**

Service Provider	SEIS Alternative 5 <sup>1</sup>	SEIS Alternative 6 <sup>1</sup>	Revised Proposal <sup>1</sup>	Revised Proposal w/o Affordable Hsg. <sup>1</sup>
Police Service <sup>2</sup>	8.9 officers	7.7 officers	8.0 officers	7.7 officers
Fire Service	1.8 firefighters	1.6 firefighters	1.6 firefighters	1.6 firefighters
Hospital Dist. #2 Medic One <sup>3</sup>	5.4 EMTs, 6.6 paramedics	4.7 EMTs, 5.7 paramedics	4.9 EMTs, 5.9 paramedics	4.7 EMTs, 5.7 paramedic
Cle Elum Medical Clinics <sup>3</sup>	0.6 physicians, 4.8 APCs, and 3.6 RNs	0.5 physicians, 4.2 APCs, and 3.1 RNs	0.5 physicians, 4.3 APCs, and 3.2 RNs	0.5 physicians, 4.1 APCs, and 3.1 RNs
Hospital Dist. #1 Ellensburg Hospital <sup>3</sup>	1.0 physicians, 0.2 APCs, and 6.0 RNs	0.9 physicians, 0.2 APCs, and 5.2 RNs	0.9 physicians, 0.2 APCs, and 5.3 RNs	0.9 physicians, 0.2 APCs, and 5.2 RNs
Emergency Dispatch/KITTCOM	0.9 dispatchers	0.8 dispatchers	0.8 dispatchers	0.8 dispatchers
Public Schools	376 students 25.4 teachers 6.3 to 8.4 new buses	229 students 15.5 teachers 3.8 to 5.1 new buses	234 students 15.8 teachers 3.9 to 5.2 new buses	229 students 15.5 teachers 3.8 to 5.1 new buses

**Sources:** *Cle Elum–Roslyn–South Cle Elum Police Dept., Cle Elum Fire Dept., Kittitas Hospital Districts #1 & #2, KITTCOM, Cle Elum – Roslyn School Dist., 2020 and 2022.*

<sup>1</sup> Calculations based on 2022 population data for service provider jurisdictions.

<sup>2</sup> Based on data from Cle Elum Police Department indicating a current staffing level of 12 officers per 3,775 population.

<sup>3</sup> Based on 2020 staffing levels identified by Hospital District No. 1 and No. 2.

EMT = Emergency Medical Technician

APC = Advanced Practice Clinician

RN = Registered Nurse

As noted previously, the Police Department also provided an update of their alternative ICMA methodology analysis, which is not based solely on population. Using this method, the Police Department estimates that the Revised Proposal would generate the need for a total of eight additional officers at full buildout with or without the additional affordable housing units of the Revised Proposal (*Cle Elum-Roslyn-South Cle Elum Police Department, 2022*). It is unknown whether the ICMA method would result in a different estimate of need once South Cle Elum is withdrawn from the department’s service area.

New officers would require additional vehicles and other equipment. The growth and service demand represented by 47<sup>o</sup> North may also contribute to an eventual need to expand the existing police station. The Police Department is in the very early stages of planning for a new or expanded police station, including the possibility of a joint facility with the Kittitas County Sheriff’s Department. Given the preliminary nature of such plans, however, the extent of any impact and proportional responsibility of 47<sup>o</sup> North cannot be determined at this time.

## *Fire Protection Service*

During operation, new residents and RV site visitors would generate additional demand for fire protection services. Based on the Fire Department's identified future need for full-time firefighters and an average of the full-time firefighters in comparably sized cities (4 firefighters per 6,115 people), it is anticipated that new development and associated population under the Revised Proposal at buildout would generate the same need for additional full-time firefighters as SEIS Alternative 6 but less than SEIS Alternative 5 in 2031. The 50 affordable housing units would not materially change the need for firefighters for the Revised Proposal (see **Table 3.7-3**).

Additional equipment would also likely be required, including replacement of the primary fire engine and primary ambulance.

**Emergency Access.** Like SEIS Alternative 6, the proposed access points and on-site access roads under the Revised Proposal would provide adequate emergency access based on the International Fire Code (IFC); no additional emergency access is required for the Revised Proposal subject to confirmation by the Fire Department. However, to enhance public safety for other neighborhoods in the Cle Elum area, the Revised Proposal includes an emergency access road in the RV resort that extends to the southern site boundary (see **Figures 2-4**, Master Site Plan – Revised Proposal). The City and the Horse Park could extend this road offsite through the Horse Park and connect to Douglas Munro Boulevard. With this off-site extension, emergency access could be provided from Bullfrog Road and SR 903 to Douglas Munro Boulevard for other neighborhoods in the Cle Elum area.

Under SEIS Alternative 6, an emergency access road could also be provided by the City from the affordable housing site access road. Under the Revised Proposal, the affordable housing site would not be developed on a separate site (affordable housing would be located in the multi-family area onsite), and an emergency access road would not be provided from this portion of the site.

## *Hospital & Emergency Medical Service*

The following analysis is based on the application of several different levels of service (LOS) to estimate demand with the Revised Proposal. The affected service providers, Kittitas Valley Hospital Districts No. 1 and 2, have not adopted quantitative LOS standards and the impact analysis in the SEIS and this Addendum are, therefore, based on several de facto ratios of staff-to-population. Use of de facto standards is a standard approach used in environmental documents in situations where quantitative LOS standards have not been adopted by the jurisdiction or service provider. The ratio used in the SEIS to identify impacts was based on the current number of staff in affected local and regional healthcare facilities using different service area populations (Upper County or county-wide, respectively). Those same ratios are used again in this document to help facilitate comparisons between the SEIS

Alternatives and the Revised Proposal. As noted previously, the proxy population assumed for the RV sites and transient visitors may overstate demand by some degree.

Hospital District No. 1 and 2 also provided two additional staffing ratios based on existing and future county-wide and state-wide population in response to a request for updated information. The results of applying the ratios are also included in the analysis. It is noted, however, that the broad staffing categories used by the Hospital Districts in the information provided for this document differ from and are not directly comparable to those provided and used in the SEIS. In addition, it is important to identify and segregate any existing deficiencies that may be reflected in current staffing levels so that they are recognized as such and are not inappropriately attributed to the Revised Proposal. Relatedly, the Hospital Districts have acknowledged that they are currently affected by staffing shortages due to retirements, job changes, and workers leaving the area. The staff reductions could be considered to reflect a decrease in the level of service or as existing deficiencies. However, the analysis takes a more conservative approach that treats this reduction as temporary and uses the former (SEIS) staffing level to avoid underestimating future project-related demand.

**Kittitas Valley Hospital District No. 1.** Hospital District No. 1 is expected to experience increased demand for hospital services from new residents under the Revised Proposal. Based on 2020 staffing levels at the hospital in Ellensburg (17 physicians, four APCs, and 101 RNs per 46,570 people), it is anticipated that the Revised Proposal at buildout would generate the same need for additional staff as SEIS Alternative 6 but less than Alternative 5 in 2031. The additional affordable housing units included in the Revised Proposal would comprise approximately 2% of the additional demand for RNs; the demand for physicians and APCs would be relatively equal with or without the additional housing units (see **Table 3.7-3**). Potential demand associated with transient recreational visitors is addressed on page 3.7-6 above and in the separate discussion on page 3.7-12 below. The district anticipates that increased demand (as well as other growth in the County) would result in the need to provide additional building space at one of the existing facilities.

The following discussion is based on the updated information provided by Hospital District No. 1 on their current and projected staffing needs using ratios of staff to existing and forecast countywide and statewide population. These ratios are not adopted levels of service and it is not clear if the district uses them for its own planning, hiring or other purposes. Results are shown in **Table 3.7-4** and vary considerably depending on which ratio is applied. Either ratio, however, indicates an existing deficiency in current district staff levels before considering the impacts of the Revised Proposal. Applying staffing ratios that are based on the 2020 census population of the State of Washington as a whole and state-wide healthcare staffing levels provided by the Hospital Districts, the current Kittitas County population of approximately 50,000 people would require a total of approximately 13 primary care providers, 183 mental health providers, 42 dental providers, and 136 specialty care providers. As noted earlier in this section of the Addendum, staffing needs with a

future County population of 70,000 are not documented for reasons identified in the discussion.

**Table 3.7-4  
HOSPITAL DISTRICT NO. 1 STAFF NEEDS –  
ALTERNATIVE POPULATION-BASED RATIO  
(50,000 COUNTY POPULATION<sup>A</sup>) – REVISED PROPOSAL**

Provider Type	Existing Staff <sup>1</sup>	Current Staff Needs based on 50,000 Population <sup>1, 3</sup>	Existing Deficiency	Staff Needs of Revised Proposal <sup>3, 4</sup>
Primary Care	29 providers	42 providers	13 providers	<b>2.1 providers</b>
Mental Health	82 providers	185 providers	103 providers	<b>9.3 providers</b>
Dental Health	22 providers	42 providers	20 providers	<b>2.1 providers</b>
Specialty Care	N/A <sup>5</sup>	136 providers	N/A <sup>5, B</sup>	<b>6.9 providers</b>

**Source: Hospital District No. 1, 2022; EA Engineering, 2022.**

<sup>1</sup> Assumes a current County population of 50,000 as provided by Hospital Districts. Note that existing county population (2020 census as adjusted by OFM) is 46,468.

<sup>2</sup> Kittitas County hospital staff-to-population ratios provided by Kittitas Hospital Districts on Oct. 10, 2022. Existing staff was derived based on this ratio.

<sup>3</sup> Washington state hospital staff-to-population ratios provided by Kittitas Hospital Districts on Oct. 10, 2022.

<sup>4</sup> Based on permanent population from the residential uses and proxy population from the RV resort under the Revised Proposal (see the Housing, Population, and Employment analysis for the calculation of this population). Result reflects project population and need as a proportion of countywide population and need exclusive of existing deficiency. As noted previously, the RV proxy population may overstate demand.

<sup>5</sup> No existing Kittitas County ratio of hospital staff to population was provided for this category of staff.

Notes:

A. The alternative County staff-to-population ratios provided by the Hospital Districts and used to calculate existing staff are as follows:

- Primary Care – 1 provider / 1,710 population
- Mental Health – 1 provider / 610 population
- Dental – 1 provider / 2,280 population
- Specialty Care – no ratio available.

The alternative Washington State staff-to-population ratios provided by the Hospital Districts and used to calculate current and future staff need based on countywide population, as well as the staff needs of the Revised Proposal, are as follows:

- Primary Care – 1 provider / 1,180 population
- Mental Health – 1 provider / 270 population
- Dental – 1 provider / 1,200 population
- Specialty Care – no ratio available.

B. Note that the existing deficiency has not been calculated for the future/2037 population scenario. The Revised Project’s elements would be built out in 2028 (residential/RV) and 2031 (commercial) and would not be generating additional population or staff needs in 2037.

Proportional hospital staffing demand from the Revised Proposal was analyzed based on the alternative staffing ratios provided by Hospital District No. 1. The results – showing existing staffing deficiencies and projected staffing needs of the Hospital District based on current Kittitas County population – are shown in **Table 3.7-4**. As indicated in the table, when the alternative ratios are applied, approximately one-third of the Hospital District’s projected needs reflect existing staffing deficiencies. (Note that complete data is not available for all provider categories, so results are approximate.) The Revised Proposal would generate a

need for approximately 20.4 staff across the provider categories, including a substantial number of staff that would be needed to correct existing deficiencies based on these hypothetical ratios, compared to approximately 15.6 based on the staff-to-population ratio used in the SEIS.

**Kittitas Valley Hospital District No. 2.** During operation, new residents and RV site visitor population would generate increased demand for emergency medical services (ambulance transports, etc.) and hospital services. Based on 2020 staffing levels for Hospital District No. 2 Medic One (9 EMTs and 11 paramedics per 4,200 people), it is estimated that new development and associated population under the Revised Proposal at buildout, including the proxy population calculated for the RV component, would generate incrementally greater need for more additional staff than SEIS Alternatives 6 and less than SEIS Alternative 5 in 2031 based on the District's 2022 service area population. The demand attributable to the additional population/affordable housing units included in the Revised Proposal compared to SEIS Alternative 6 would comprise approximately 4% of the increased demand (see **Table 3.7-3**). The incremental differences are not considered significant and impacts with either alternative would be less than for SEIS Alternative 5. As discussed previously, the assumed RV proxy population and resulting impacts identified for the Revised Proposal and Alternative 6 likely double count and overestimate demand.

Note that SEIS Alternative 6 did not study the impacts of the 50 affordable housing units that would ultimately be developed by others on the land dedicated to the City for that purpose. Those impacts would be the same as the incremental impact associated with the Revised Proposal.

The existing clinics in Cle Elum would also see increased demand. 2020 staffing levels at the facilities in Cle Elum consist of one physician, eight APCs, and six RNs per 4,200 population. It is estimated that the Revised Proposal, including the RV proxy population, would generate the need for incrementally more staff than SEIS Alternatives 6 but less than SEIS Alternative 5. The 50 additional affordable housing units would comprise approximately 4% of the additional demand for APCs and RNs; the demand for physicians would be relatively equal with or without affordable housing units. The incremental differences are not considered significant. As noted previously, the RV proxy population used in this analysis is considered conservative and likely overstates impacts.

The potential number of emergency services calls that could be generated by the Revised Proposal can also be estimated using recent service call data provided by Hospital District 2. Of the total calls received by Hospital District No. 2 in 2022 (1,420 total calls), approximately 425 calls were for service in the City of Cle Elum. With approximately 1,175 housing units in the City of Cle Elum in 2022, the existing housing units generated approximately 0.36 emergency service calls per housing unit in 2022. Using that same ratio of calls per housing unit, the new residential units under the Revised Proposal would generate approximately 274 emergency service calls per year. Calls could vary further if occupancy and or vacancy rates are lower than assumed for the analysis (refer to SEIS Section 3.9).

**Demand for Hospital District Service from the RV Resort.** As mentioned previously, the demand for Kittitas Valley Hospital Districts’ services from the RV resort component of the Revised Proposal and SEIS Alternative 6 was estimated by calculating and incorporating a proxy population from the resort in addition to the permanent population. These calculations are based on two different methodologies discussed above.

The Kittitas Valley Hospital Districts have also questioned whether transient visitors to the 47° North RV resort would generate greater demand for the Hospital Districts’ services than the general population. The Hospital District did not provide any data to support this hypothesis, however. As noted in the previous paragraph, the proxy population estimate identified in the SEIS and this Addendum are intended to account for the demand from the RV resort. The SEPA consultant conducted additional research and analysis which did not identify any local or national data that directly supports the hypothesis that RV visitors would generate disproportional demand for medical or emergency services. Most of the data, in fact, suggests the converse, i.e., that transient recreational-visitor related demand would be less than that associated with permanent residential population. Relevant data is described below.

It is noted in passing that the MountainStar Draft EIS (Kittitas County, 1999) did not evaluate impacts to Hospital District No. 1 and the conditions of approval did not require any specific mitigation for the Master Planned Resort, which was proposing more than 4,000 recreational-residential units and extensive recreational facilities, other than monitoring of demand and reporting to Kittitas County every 2-5 years. The EIS analysis for Hospital District No. 2 similarly did not quantify anticipated demand but did require acquisition of an ambulance for the district and periodic monitoring/reporting of calls.

As background, the 47° North RV resort includes RV and glamping sites and related recreational facilities (see **Chapter 2** for details). The main activities at the RV resort would be leisure and recreational in nature and would include the use of on-site parks, trails, and amenity centers. Visitors would stay at the resort for an average of three to four days. RV visitors could also participate in off-site recreational activities.

One study identified the most common injury activities associated with sports and recreation activity as hiking, winter sports, and mountaineering (*Stephens, Dickema, Klein 2005*). Some data, while not definitive, suggests that the average RV owner, who is 55+ years old (see Section 3.3, **Housing, Population, and Employment** for details), is less likely to engage in the types of recreational activities (skiing, football, basketball, soccer) that are more likely to result in injury and emergency room admissions. (*National Health Statistic Reports, 2019*). This data implies that the off-site recreational activities in which the visitors to the 47° North RV resort might engage – such as hiking, given that the average age of RV visitors would be 55+/- – would not likely result in a substantial demand for hospital/emergency medical services.

Some relevant data specific to Washington State also identifies the potential for recreational injuries to be sustained during hiking. Between 1997 and 2001, a total of 535 injuries were reported at the Mt. Rainier and Olympic National Parks, which equates to an average of 20.4 incidents per million visits or 0.00002 injuries per visit. This is a low incident rate and likely not all the incidents resulted in emergency care or hospitalization.

Available local data also sheds light on the potential demand associated with the RV sites. The most recent Kittitas County *Community Health Improvement Plan*, summarizing information collected between 2018 and 2023, indicates that the biggest factors impacting Kittitas County's health and therefore health services are: being a rural area with healthcare and mental health provider shortages; and having a large older adult population, a large university student population, a significant amount of families in poverty, and lower median per capita and household incomes (*Read, Fuller 2023*). Health service impacts relating to the County's transient population/recreational visitors are not identified as a major factor.

Information on calls to the Ellensburg KOA RV Resort by KITTCOM over an eight-year period was also collected and analyzed. This data indicates that the Ellensburg RV resort -- which is a similar use occupied by transient/ recreational visitors -- generates considerably fewer calls for emergency police, fire, and hospital services -- an average of 20 calls per year, or 0.16 calls per site per year -- compared to 1.77 calls per residential unit per year for the Kittitas County residential population as a whole. Additional information is included in the following subsection on *Emergency Dispatch Service*.

Overall, therefore, national, state and local data identified through the foregoing research does not support the hypothesis that the transient/recreational-oriented population of the RV component of 47° North would generate greater than anticipated demand for emergency or hospital services. No data was provided or otherwise identified to support this assertion. The proxy population included for the RV sites already addresses, and likely overestimates, recreational tourist demand. Local data from a similar land use, in fact, suggests that demand would be lower than a typical residential unit. And it has been noted previously that the region is a popular recreational destination and that any demand associated with a transient population is already blended into each provider's calls for service and resulting staffing needs and are factors in the de facto levels of service used in the SEIS and this Addendum.

### *Emergency Dispatch Service*

Calls for service for the Cle Elum-Roslyn-South Cle Elum Police Department, Cle Elum Fire Department, and Hospital District No. 2 from the Revised Proposal would be handled and dispatched by KITTCOM. Based on the updated staffing levels provided by KITTCOM (15 dispatchers for 47,200 people), it is anticipated that development under the Revised Proposal at buildout would generate the same need for additional staff as SEIS Alternative 6 but less than SEIS Alternative 5 in 2031 (see **Table 3.7-3**).

Although the SEIS and Addendum attribute a proxy/equivalent population to the RV component of 47° North, updated data suggests that the demand associated with this transient population may be overestimated. For example, data from Hospital District No. 2 indicates that emergency call volumes have not substantially increased over the past 7 years<sup>2</sup> despite permanent population growth and increased recreational/transient population within their service area.

In addition, KITTCOM provided historic annual call data to the existing KOA RV Park in Ellensburg (which contains 121 sites) between 2014 and 2021 (*KITTCOM, 2022*). In this 8-year period, the KOA RV Park generated an average of approximately 20 emergency calls to KITTCOM annually, which equates to approximately 0.16 calls per RV site per year. Note that emergency service calls from KITTCOM include calls for police, fire/emergency medical, and hospital service.

Based on this call generation rate derived from local data, it is estimated that the RV component in SEIS Alternative 6 and the Revised Proposal (627 sites) would generate approximately 103 emergency calls per year in total. The residential uses in SEIS Alternative 6 and the Revised Proposal would generate approximately 1.77 calls per residential unit annually, which would equate to approximately 1,339 calls per year. Therefore, based on data from a similar use located in Kittitas County, the RV sites could be expected to generate fewer calls to KITTCOM than the proposed residential units and fewer than estimated attributing a proxy/equivalent population to the Revised Proposal's RV sites. This alternative method for calculating demand suggests that the RV equivalent/proxy population metric may be overly conservative and overestimates potential demand.

### *Public Schools*

**Students.** Development and associated residents during operation of the Revised Proposal would generate new students and increased demand for public school services from the Cle Elum-Roslyn School District.<sup>3</sup> Based on the recently updated student generation rates of approximately 0.4 students per single family residence and 0.1 students per multi-family residence<sup>4</sup>, it is anticipated that new residential units under the Revised Proposal at buildout would generate more additional students than SEIS Alternative 6 at buildout, but less than SEIS Alternative 5 in 2031 or at buildout. The 50 affordable housing units would comprise approximately 2% of the increased student generation (see **Table 3.7-3**), while most of the increase is attributable to the district's updated student generation factors.

Based on grade level percentage information recently provided by the Cle Elum-Roslyn School District (60% elementary students, 20% middle school students, and 20% high school

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<sup>2</sup> Hospital District No. 2 received 1,420 calls for service in 2022. The seven-year average (2016-2022) has been approximately 1,458 calls for service annually.

<sup>3</sup> RV site population is not considered a permanent population on the site and as such, population associated with the RV resort is not factored into the student generation analysis.

<sup>4</sup> Updated student generation rates derived from the Cle Elum-Roslyn School District in November 2022.

students), it is anticipated that of the students generated by the Revised Proposal, 140 students would be elementary school age, 47 would be middle school age, and 47 would be high school age.

As noted above in the *Affected Environment* sub-section, recent enrollment projections from the School District include updated assumptions for student generation from the Revised Proposal as well as other known anticipated development expected to occur within the school district (e.g., City Heights, Suncadia). Based on existing School District facility capacity of 970 students identified in the SEIS, it is anticipated that the projected enrollment identified in **Table 3.7-1**, a portion of which would be students from the Revised Proposal, would exceed the School District's existing facility capacity by 2024. Exceedance of the School District's facility capacity could exacerbate the need for new or expanded facilities.

**Teachers.** New students under the Revised Proposal would generate a need for additional teachers within the School District. Based on the School District student-to-teacher ratio (approximately 14.8 students for every teacher), new students associated with the Revised Proposal at buildout would generate the need for slightly more additional staff than SEIS Alternative 6 but less than SEIS Alternative 5 in 2031. The additional affordable housing units in the Revised Proposal would comprise approximately 2% of the anticipated demand for new teachers (see **Table 3.7-3**).<sup>5</sup> This is not considered a significant change in identified impacts.

**School Buses.** New students under the Revised Proposal would also create additional demand for school buses to transport students to and from school. Based on approximately 45 to 60 students in a typical school bus, it is anticipated that the Revised Proposal at buildout would generate the need for more additional buses than SEIS Alternative 6 but less than SEIS Alternative 5 in 2031. The additional 50 affordable housing units in the Revised Proposal would comprise approximately 2% of the anticipated demand for additional school buses (see **Table 3.7-3**). This is not considered a significant change in identified impacts.

### **Indirect and Cumulative Impacts**

Indirect impacts under the Revised Proposal are anticipated to be similar to SEIS Alternative 6 and could include minor additional demand for public service agencies that have mutual aid agreements with Cle Elum, such as police and fire departments. Additional indirect student generation in the Cle Elum-Roslyn School District could also occur from growth in population associated with new employment.

Cumulative impacts to public services would also be similar to SEIS Alternative 6 and would result from other development in the site vicinity and its associated population within the same time horizon. Such development would include ongoing development of the Suncadia

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<sup>5</sup> Note that actual future needs for new teachers would be based on student enrollment, as well as other factors such as state and local funding that is available to the School District, and future state policies and programs.

resort (in unincorporated Kittitas County), and development of the City Heights and Cle Elum Pines (in City of Cle Elum). Other smaller scale development would also likely occur in Kittitas County, City of Cle Elum, City of Roslyn, and Town of South Cle Elum. This development, together with the Revised Proposal, would generate additional population in the area which would increase demand for public services and impacts on the County, City of Cle Elum, and other nearby jurisdictions.

### **3.7.3 Mitigation Measures**

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No new significant adverse impacts to public services would occur from the Revised Proposal and no additional mitigation measures are necessary. However, data identified in the Addendum identifies uncertainty regarding some estimates of impacts, and local and national data that could influence how demand is accurately calculated. It is recommended, therefore, that the quantity of service calls for affected providers, such as for emergency response, be monitored periodically to determine actual demand. Note that a mitigation measure for fiscal impacts is also relevant.

The mitigation measure identified below includes a measure that has been updated for the Revised Proposal compared to 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)**

##### **Approved Bullfrog Flats Conditions of Approval (Included in the Project)**

- Mitigation measures for each public service provider would include execution of a separate mitigation agreement, where feasible, and a program to monitor actual calls for service, actual revenues and expenses, for affected providers. The program would, to the maximum extent possible, strive to time expenditures to when revenues are available and strive to time capital expenditures to when the jurisdiction has sufficient capacity to issue bonds for the improvements and sufficient tax revenue to service the debt. The program would also rely on shortfall mitigation payments to address any identified fiscal impacts, where applicable.
- Monitoring would track the number of service calls to affected providers at reasonable intervals to allow comparisons of actual and estimated calls and impacts. Any mitigation requirements would be adjusted accordingly to reflect actual impacts. Outreach and coordination between the Applicant and affected service providers is underway and is anticipated to result in mitigation agreements that will address impacts that are attributable to the Revised Proposal. Executed agreements will be included in a new or updated Development Agreement, if available.

- Site development would follow the Land Stewardship Plan (LSP) that is used for Suncadia, which includes provisions for fire-wising (e.g., thinning small trees, cutting limbs, raking debris and other fuel-reduction techniques to help prevent fires) during operation of the project. The LSP would be reviewed and updated, as necessary.

### **Required Mitigation Measures**

- Roadway design would conform with applicable requirements for vehicular access, including roadway width, adequate turning radius, fire hydrant access, provisions for vehicle back up, and weight bearing capacity to provide adequate emergency access to site.
- A secondary access would be provided when more than 30 single- or multi-family units are built, in accordance with the International Fire Code (IFC) to provide emergency access to the site.