

From: [Deborah Girard](#)
To: [Chace Pedersen](#)
Cc: [James Carmody](#)
Subject: The Outpost - CU-23-00002
Date: Thursday, November 30, 2023 3:52:10 PM
Attachments: [MFT Scan_20231130_154933.pdf](#)

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Mr. Pedersen, my apologies, there was 2 page 4 of the letter I just sent you. Here is a corrected version.

Debbie Girard

Paralegal to James C. Carmody

Meyer, Fluegge & Tenney, P.S.

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November 30, 2023

Via Email

Kittitas County Planning Department
Chace Pedersen, Staff Planner
411 North Ruby Street, Suite #2
Ellensburg, WA 98926
Chace.pedersen@co.kittitas.wa.us

Re: Project File No.: Cu-23-00002
Project Name: The Outpost
Applicant: Michael Jackson (Landowner); Shari Bay (Authorized Agent)

Dear Mr. Pedersen:

We represent interested and adversely impacted landowners and provide these comments with regard to the *Conditional Use Permit Application* proposing development of a campground and guest ranch at 13131 Salmon La Sac Road, Ronald, WA 98940. These comments address several key issues that warrant careful consideration before approval can be granted. We reserve the right to provide additional comments on both the land use application and environmental review and determinations.

1. Density.

The proposed campground, with 30 units on 9.97 acres, is in clear violation of the R-R Rural Recreation Zone density limit, which limits density to one unit per 5 acres. The purpose and intent statement for the Rural Recreation (R-R) zoning district is as follows:

The purpose and intent of the Rural-Recreation zone is to provide areas *where residential development may occur on a low density basis or in residential clusters*. A primary goal and intent of siting R-R zones will be to promote rural recreation residential development associated with many natural amenities found within Kittitas County.

KCC 17.30.010. The proposed land use is neither residential nor low density.

A. The R-R Rural Recreation Zone establishes a minimum density of one unit per five acres. Under this provision, the permissible number of units on the subject property, when considered as a single parcel, would be limited to one which already exists. However, the property is currently comprised of three legally established parcels. When assessed individually, each of these

parcels within the confines of the proposed campground has the potential to qualify for a single unit on each parcel for a total of three. Cluster plat development would allow smaller parcels but does not allow a density increase.

- B. Regarding density the size of the unit does not matter in density calculations it is the number of units that are habitable within the define property boundary's that defines the density.
- C. This application for a campground is proposing thirty (30) units of density. Taking the projected number of cabins (30) with a property size of 9.97 acres the density of this development is 1 unit per 1/3 acre of available land. That is 30 times greater then the 1 unit allowed under the current zoning.
- D. Given that the Kittitas County Zoning Code expressly limits the density in the Rural Recreation zone to 1 unit per 5 acres, this application, with 30 units on 9.97 acres, should be rejected outright.

2. Internal Access Road.

- A. Applicant proposes a driveway on 30' easement with 16' gravel roadway width. The proposed driveway violates KCC 12.04.070 Table 4-4A (See Exhibit A) standards. A Joint Use Driveway standard may be utilized only when serving four or fewer units. Applicant proposes a substandard driveway to serve thirty (30) units.
- B. The proposed 30 units requires a 60-foot minimum easement, paved aprons for each unit, and a 22-foot roadway with 1-foot shoulders, none of which are addressed in the submitted site plan. KCC 12.04.080 – Table 4-4A.
- C. The access is also contrary to International Fire Code (IFC) standards for fire apparatus access roads set forth in IFC Appendix D.
- D. The failure to meet these requirements poses a serious fire, life, and safety concern, warranting the withdrawal and reissuance of the application once compliance with county code is achieved in its design as shown by a revised site plan for further comment.

3. Water.

- A. The lack of an existing water right for commercial use on the property raises questions about the feasibility of the proposed campground project, the application, and the SEPA that accompanies it.
- B. In the initial application, it was indicated that a Group A water system would be established for

the proposed campground. Subsequently, an amendment was made to specify the utilization of a Group B water system. However, considering that the project envisions 30 units, it is crucial to note that a Group B water system is restricted to serving 14 units according to the guidelines set forth by the Washington State Department of Health. Consequently, the amended application is not in compliance with the regulatory framework established by the Department of Health.

- C. The neighboring community of Driftwood Acres, situated just northwest of the proposed campground, has experienced depletion of well water resources. Given this, the likelihood of securing a substantial new water right for commercial purposes in this region appears uncertain without a thorough investigation by the Department of Ecology. In light of this circumstance and prior to advancing with the application process, the applicant should demonstrate that they are in the possession of an approved commercial water right explicitly designated for serving this Conditional Use. This proactive measure ensures alignment with regulatory requirements and underscores the responsible management of water resources essential for the proposed project that do not impact the surrounding area.
- D. The SEPA must be amended to accurately reflect the water system type and provide the necessary information for public and agency comments.

4. Stormwater Management.

- A. Presently, the majority of the land earmarked for development is covered with dense forest, serving as a natural water control system. However, the proposed development plan, characterized by high density, entails the removal of a substantial portion of existing trees and vegetation. This will be replaced by hard surfaces or compacted surfaces, thereby diminishing the capacity of the forest floor to absorb water within the project boundaries. There is a notable absence of discourse regarding a stormwater management plan for this property. Furthermore, the proposal fails to address the consequential impact of forest removal on stormwater dynamics, particularly concerning its effect on the surrounding property and Lake Cle Elum. A comprehensive discussion and strategic planning for stormwater management are essential components that merit inclusion in the overall project considerations and should be contained within this application.
- B. The absence of a stormwater plan is a glaring oversight, considering the removal of existing forest cover and the potential impact on Lake Cle Elum and surrounding areas.

5. Compatibility.

- A. While the rural recreational zone does permit campgrounds as a conditional use, it is advisable to consider locations that are not in close proximity to residential housing. The current zoning density, requiring 1 unit per 5 acres, was adopted subsequent to the subdivision and development

of most home sites adjacent to the proposed project. There are five parcels bordering the proposed campground, each with an existing home. Utilizing the county's website to determine the homes' locations in regards to the proposed campground, it is evident that all neighboring residences are within 100 feet of the proposed campground.

B. The adjacent residential homes are detailed in Exhibit B, providing property information for each parcel:

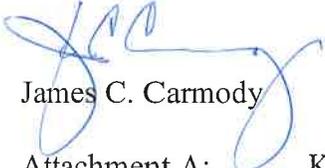
- i. 447035 - 0.72 Acre with home
- ii. 337035 – 1 Acre with home
- iii. 116935 – 1.67 Acres with home
- iv. 596935 – 5.23 Acres with home
- v. 437136 – 1.7 Acres with home

C. Regrettably, the proposed Determination of Non-Significance (DNS) fails to address the mitigation of impacts on these homes. Neither the State Environmental Policy Act (SEPA) nor the application provides any information or plan to alleviate the effects on these parcels and homes. To approve this propose CUP it is imperative that the county incorporate measures to mitigate potential impacts on nearby residential properties, and I recommend revisiting the proposal to address these concerns comprehensively.

In conclusion, the aforementioned issues highlight the need for a comprehensive reassessment of the proposed campground application. The current submission falls short of complying with essential zoning regulations and poses risks to public safety, water resources, and surrounding properties. It is recommend rejecting the current application and urging the applicant to resubmit a revised plan that aligns with county codes and addresses the identified concerns.

Thank you for your attention to these critical matters.

Very truly yours,
MEYER, FLUEGGE & TENNEY, P.S.


James C. Carmody

Attachment A: Kittitas County Code
Adjacent Property Information

Exhibit A

Kittitas County Code

12.04.070 Table 4-4A

Table 4-4A

Private Road Minimum Design Standards

Design Elements	Road Type				
	Joint-Use Driveway	Private Road ²	Private Road ²	Private Road ²	Private Road
		Average Lot Size <= 10.0 acres			Average Lot Size > 10.0 acres
Number of Parcels and/or Units	4	3-14	15-40	41+	2+
Minimum Easement Width	30' ³	60' ³	60'	60'	60'
Paved Apron ¹	N/A	Req'd	Req'd	Req'd	Req'd
Roadway Width	12' or 16'	20'	22'	22'	20'
Shoulder Width	N/A	1'	1'	2'	1'
Minimum Centerline Radius (ft)	N/A	60		60	60
Surfacing Requirements ⁴	Gravel	Gravel		BST/ACP	Gravel
Minimum Crushed Surfacing ⁵	N/A	6"		6"	6"
Maximum Grade % ⁶	15	10		10	10
Cul-de-Sac Required	N/A	Req'd		Req'd	Req'd
County Road Approach Permit	Req'd	Req'd		Req'd	Req'd
Stopping Site Distance	N/A	AASHTO		AASHTO	AASHTO
Ditch Slope (inside slope)	2:1	2:1		2:1	2:1

¹Applies to all roads accessing existing paved roadway.

²All private roads shall be inspected and certified by a civil engineer licensed in the State of Washington for conformance with the current edition of the Kittitas County Road Standards

³Existing road easements may be a minimum of 40'. New road easements shall be a minimum of 60'. Existing driveway easements may a minimum of 20'. New driveway easements shall be a minimum of 30'.

⁴Crushed surfacing per WSDOT Standard Specifications.

⁵Additional depth may be required for roads that are to be public roads.

⁶A variance request is required for private road grades between 10-12%

Exhibit B

Adjacent Residential Homes Property Information for the Parcels Listed Below are on the
Following Pages Following Attached Pages

447035 - 0.72 Acre with home
337035 - 1 Acre with home
116935 - 1.67 Acres with home
596935 - 5.23 Acres with home
437136 - 1.7 Acres with home



Property Report for Parcel#: 447035

Thursday, November 30, 2023

Parcel Information

Address:	13001 SALMON LA SAC RD RONALD
Tax Parcel ID:	447035
Map Number:	21-14-34050-0025
Recorded Area:	0.00
Owner Name	MILLS 2006 FAMILY TRUST
Name Cont:	
Mailing Address:	PO BOX 1530
City/State/Zip:	RONALD WA 98940



Critical Areas Information

Contains > 30% Slope:	No
PHS Site Name:	N/A
Roof Hazard:	HIGH_EXTREEME HAZARD RATING
Roof Class:	CLASS A
Seismic Category:	D1
Shore Line:	N/A
Wetland Code:	N/A
DNR Water Type:	N/A
FIRM Zone:	
FEMA Flood Map:	53037C0365D
Coalmine Shaft:	N/A
Airport Zone:	N/A
BPA Right of Way:	-1
Max Elevation:	2300
ISO:	0.064
PG:	147, Engineering is required

Administrative Information

Zone and Allowed Uses:	Rural Recreation
Land Use Category:	Rural Recreation
Commisioner District:	0
Voter Precinct:	
Hospital District:	HOSPITAL DISTRICT 2
School District:	Cle Elum-Roslyn School District
Irrigation District:	N/A
Weed District:	
Fire District:	Fire District 6 (Ronald)
Cemetery District:	N/A
Court District:	Upper District Court
PUD Comm District:	District 2
Parks and Rec District:	District 1
Wildland Urban Interface:	IR 1
Stock Restricted Area:	Stock Restricted
COE Gas Service Area:	No

Domestic Water Information

Over the Counter Water:	Yes, Suitability Map
Qualifying Water Banks:	Big Creek WR, Bourne, New Suncadia (Tillman Creek), KittitasCnty(Clennon), Reecer Creek, KittitasCnty(Roth), New Suncadia(Big Creek), New Suncadia (SwaukFirstCreeks), New Suncadia (TeawayRiver), Roan New Suncadia, Swiftwater Ranch, Trailside, Western Water Partners, Yakima Mitigation Services, NGR
Sub Basin Watershed:	Cle Elum River



Property Report for Parcel#: 337035

Wednesday, November 29, 2023

Parcel Information

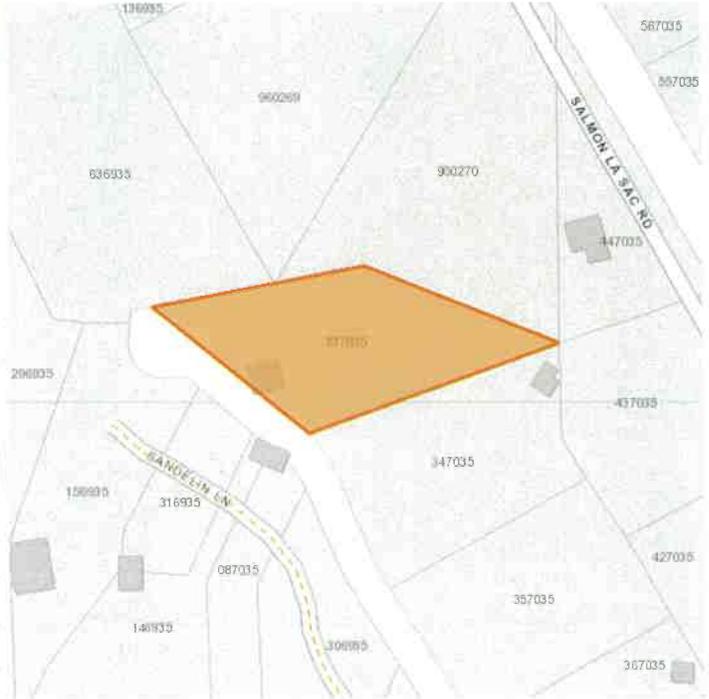
Address:	471 SANDELIN LN RONALD
Tax Parcel ID:	337035
Map Number:	21-14-34050-0014
Recorded Area:	0.00
Owner Name	WOOD, THOMAS M ETUX
Name Cont:	
Mailing Address:	2226 140TH PL SE
City/State/Zip:	MILL CREEK WA 98012-1305

Critical Areas Information

Contains > 30% Slope:	No
PHS Site Name:	N/A
Roof Hazard:	HIGH_EXTREEME HAZARD RATING
Roof Class:	CLASS A
Seismic Category:	D1
Shore Line:	N/A
Wetland Code:	N/A
DNR Water Type:	N/A
FIRM Zone:	
FEMA Flood Map:	53037C0365D
Coalmine Shaft:	N/A
Airport Zone:	N/A
BPA Right of Way:	-1
Max Elevation:	2290
ISO:	0.064
PG:	147, Engineering is required

Domestic Water Information

Over the Counter Water:	Yes, Suitability Map
Qualifying Water Banks:	Big Creek WR, Bourne, New Suncadia (Tillman Creek), KittitasCnty(Clennon), Reecer Creek, KittitasCnty(Roth), New Suncadia(Big Creek), New Suncadia (SwaukFirstCreeks), New Suncadia (TeawayRiver), Roan New Suncadia, Swiftwater Ranch, Trailside, Western Water Partners, Yakima Mitigation Services, NGR
Sub Basin Watershed:	Cle Elum River



Administrative Information

Zone and Allowed Uses:	Rural Recreation
Land Use Category:	Rural Recreation
Commisioner District:	0
Voter Precinct:	
Hospital District:	HOSPITAL DISTRICT 2
School District:	Cle Elum-Roslyn School District
Irrigation District:	N/A
Weed District:	
Fire District:	Fire District 6 (Ronald)
Cemetery District:	N/A
Court District:	Upper District Court
PUD Comm District:	District 2
Parks and Rec District:	District 1
Wildland Urban Interface:	IR 1
Stock Restricted Area:	Stock Restricted
COE Gas Service Area:	No



Property Report for Parcel#: 116935

Wednesday, November 29, 2023

Parcel Information

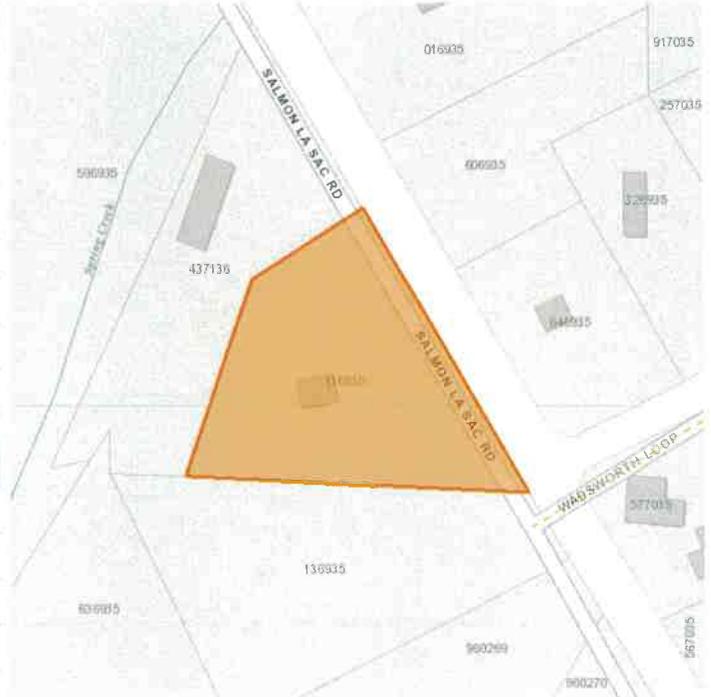
Address:	13261 SALMON LA SAC RD RONALD
Tax Parcel ID:	116935
Map Number:	21-14-34040-0016
Recorded Area:	1.81 a
Owner Name:	CATLIN, KENT R
Name Cont:	
Mailing Address:	PO BOX 257
City/State/Zip:	RONALD WA 98940-0257

Critical Areas Information

Contains > 30% Slope:	No
PHS Site Name:	N/A
Roof Hazard:	HIGH_EXTREEME HAZARD RATING
Roof Class:	CLASS A
Seismic Category:	D1
Shore Line:	N/A
Wetland Code:	N/A
DNR Water Type:	N/A
FIRM Zone:	
FEMA Flood Map:	53037C0365D
Coalmine Shaft:	N/A
Airport Zone:	N/A
BPA Right of Way:	-1
Max Elevation:	2301
ISO:	0.064
PG:	147, Engineering is required

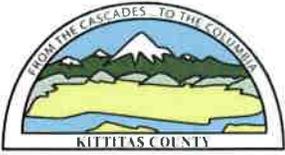
Domestic Water Information

Over the Counter Water:	Yes, Suitability Map
Qualifying Water Banks:	Big Creek WR, Bourne, New Suncadia (Tillman Creek), KittitasCnty(Clennon), Reecer Creek, KittitasCnty(Roth), New Suncadia(Big Creek), New Suncadia (SwaukFirstCreeks), New Suncadia (TeawayRiver), Roan New Suncadia, Swiftwater Ranch, Trailside, Western Water Partners, Yakima Mitigation Services, NGR
Sub Basin Watershed:	Cle Elum River



Administrative Information

Zone and Allowed Uses:	Rural Recreation
Land Use Category:	Rural Recreation
Commisioner District:	0
Voter Precinct:	
Hospital District:	HOSPITAL DISTRICT 2
School District:	Cle Elum-Roslyn School District
Irrigation District:	N/A
Weed District:	
Fire District:	Fire District 6 (Ronald)
Cemetery District:	N/A
Court District:	Upper District Court
PUD Comm District:	District 2
Parks and Rec District:	District 1
Wildland Urban Interface:	IR 1
Stock Restricted Area:	Stock Restricted
COE Gas Service Area:	No



Property Report for Parcel#: 596935

Wednesday, November 29, 2023

Parcel Information

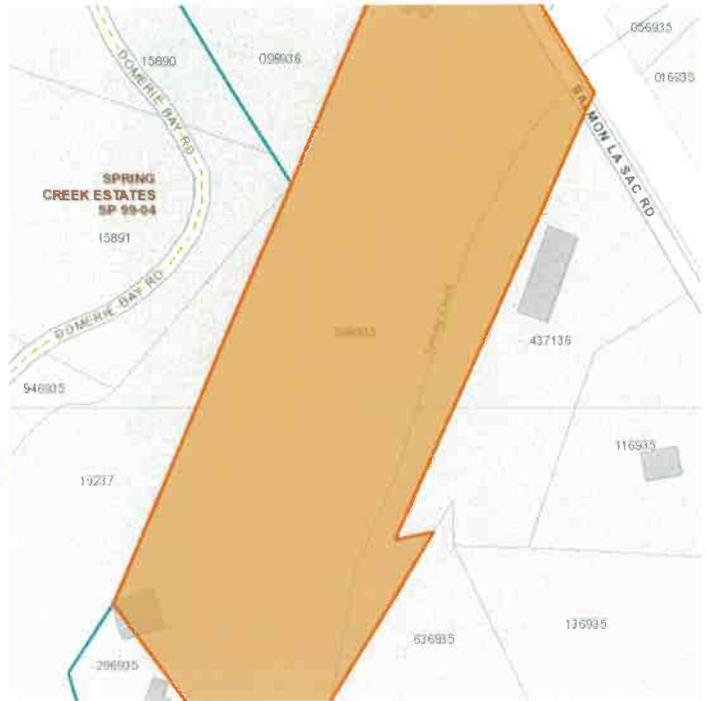
Address:	13421 SALMON LA SAC RD RONALD
Tax Parcel ID:	596935
Map Number:	21-14-34040-0009
Recorded Area:	5.60 a
Owner Name:	FLEURY, WILLIAM L
Name Cont:	
Mailing Address:	PO BOX 1456
City/State/Zip:	RONALD WA 98940-1456

Critical Areas Information

Contains > 30% Slope:	No
PHS Site Name:	N/A
Roof Hazard:	HIGH_EXTREEME HAZARD RATING
Roof Class:	CLASS A
Seismic Category:	D1
Shore Line:	N/A
Wetland Code:	R4SBC
DNR Water Type:	Type 2 (F)
FIRM Zone:	
FEMA Flood Map:	53037C0365D
Coalmine Shaft:	N/A
Airport Zone:	N/A
BPA Right of Way:	-1
Max Elevation:	2302
ISO:	0.064
PG:	147, Engineering is required

Domestic Water Information

Over the Counter Water:	Yes, Suitability Map
Qualifying Water Banks:	Big Creek WR, Bourne, New Suncadia (Tillman Creek), KittitasCnty(Clennon), Reecer Creek, KittitasCnty(Roth), New Suncadia(Big Creek), New Suncadia (SwaukFirstCreeks), New Suncadia (TeawayRiver), Roan New Suncadia, Swiftwater Ranch, Trailside, Western Water Partners, Yakima Mitigation Services, NGR
Sub Basin Watershed:	Cle Elum River



Administrative Information

Zone and Allowed Uses:	Rural Recreation
Land Use Category:	Rural Recreation
Commissioner District:	0
Voter Precinct:	
Hospital District:	HOSPITAL DISTRICT 2
School District:	Cle Elum-Roslyn School District
Irrigation District:	N/A
Weed District:	
Fire District:	Fire District 6 (Ronald)
Cemetery District:	N/A
Court District:	Upper District Court
PUD Comm District:	District 2
Parks and Rec District:	District 1
Wildland Urban Interface:	IR 1
Stock Restricted Area:	Stock Restricted
COE Gas Service Area:	No



Property Report for Parcel#: 437136

Wednesday, November 29, 2023

Parcel Information

Address:	13331 SALMON LA SAC RD RONALD
Tax Parcel ID:	437136
Map Number:	21-14-34040-0017
Recorded Area:	1.70 a
Owner Name	NELSON, RICHARD E & AMY S
Name Cont:	
Mailing Address:	12822 E 23RD AVE
City/State/Zip:	SPOKANE VALLEY WA 99216



Critical Areas Information

Contains > 30% Slope:	No
PHS Site Name:	N/A
Roof Hazard:	HIGH_EXTREEME HAZARD RATING
Roof Class:	CLASS A
Seismic Category:	D1
Shore Line:	N/A
Wetland Code:	R4SBC
DNR Water Type:	N/A
FIRM Zone:	
FEMA Flood Map:	53037C0365D
Coalmine Shaft:	N/A
Airport Zone:	N/A
BPA Right of Way:	-1
Max Elevation:	2303
ISO:	0.064
PG:	147, Engineering is required

Administrative Information

Zone and Allowed Uses:	Rural Recreation
Land Use Category:	Rural Recreation
Commisioner District:	0
Voter Precinct:	
Hospital District:	HOSPITAL DISTRICT 2
School District:	Cle Elum-Roslyn School District
Irrigation District:	N/A
Weed District:	
Fire District:	Fire District 6 (Ronald)
Cemetery District:	N/A
Court District:	Upper District Court
PUD Comm District:	District 2
Parks and Rec District:	District 1
Wildland Urban Interface:	IR 1
Stock Restricted Area:	Stock Restricted
COE Gas Service Area:	No

Domestic Water Information

Over the Counter Water:	Yes, Suitability Map
Qualifying Water Banks:	Big Creek WR, Bourne, New Suncadia (Tillman Creek), KittitasCnty(Clennon), Reecer Creek, KittitasCnty(Roth), New Suncadia(Big Creek), New Suncadia (SwaukFirstCreeks), New Suncadia (TeawayRiver), Roan New Suncadia, Swiftwater Ranch, Trailside, Western Water Partners, Yakima Mitigation Services, NGR
Sub Basin Watershed:	Cle Elum River