I want to thank county staff and the planning commission for the countless hours of hard work and dedication to this process

We have heard repeatedly about the question to be decided:

Is the Use of master planned resort appropriate for this location that is currently forest resource land

In making that decision, we must examine and account for **potential** impacts due to the lack of project specific information being provided by the applicant that is typical for the zoning change process

The question also amounts to determining if the potential impacts of the development can be mitigated or sufficiently addressed by the ordinance or through existing county code requirements

The criteria that needs to be met in order to make a change in the zoning to master planned resort are:

1. Does the project conform to the Growth Management Act, Lewis County Comprehensive Plan and County Policies

To answer that, I would like to point to the record. In 2010, Lewis County passed ordinance 1219 to allow the then property owner to divide the 500 acre site into 20 acre parcels

In 2012, according to the record in a memo to the BOCC from the Lewis County Planning Commission dated November 13, 2012. states that rezone Ordinance 1219 was appealed and "found to be not in compliance with GMA which was affirmed in Thurston County Superior Court" the Growth Management Hearings Board found that the rezone to 20 acre lots verses the 80 acre minimum lot size for this location did not achieve compliance. This

decision has left the 24 lots of a minimum 20 acres to be non conforming yet legal lots.

This clearly indicates that if the Growth Management Hearings Board and Thurston County Superior Court turned down the ordinance to reduce the lots size from 80 acres to 20 acres because of potential impacts, it would certainly not be in compliance to allow what could only be considered the highest and best use as a master planned resort

2. There is a demonstrated need for Master Planned Resort
Let me clarify that does not mean a demonstrated need specific to the YMCA camp.

It is my understanding that question is in regards to the need in Lewis County Zoning for Master Planned Resort. We currently do not have any designated Master Planned Resorts but in the Comprehensive Planning process it was determined that is something we should have for entities like YMCA.

The entire concept of comprehensive planning and zoning regulations is to look at every aspect of the landscape, the physical environment, soil, water, air, plants, fish, wildlife, then look at the people, the road access, infrastructure, life, safety, community support and then choose a location for master planned resort that is the best fit and least impacting to those elements.

Instead, we have a master planned resort request coming outside of the comprehensive planning process to meet the need of an individual landowner. If Lewis County NEEDS a Master Planned Resort ...it should be identified through careful study and the planning process that Growth Management was designed for.

3. Is the Master Planned Resort in the best interest of the Public

I again go back to the need of making a decision on the facts of the record and the anticipated effects. To make a reasonable decision of the anticipated effects, in absence of specific project details, the record indicates in the Final Report of Examination for water right application that the proposed use and basis of water demand for which a water right was granted by the Department of Ecology anticipates the following key parameters:

Approximately 100 buildings, including cabins, 3 single family dwellings, a lodge, classroom buildings, maintenance shed, etc.

Capacity to serve 20,000 campers a year (although in Table 2 in the water right it indicates 14,000 campers)

Limited irrigation for small play and assembly areas

With an estimated total peak water usage for the camp at completed buildout of 49,500 gallons of water per day

The record also describes the challenges of the steep terrain and exposed or shallow bed rock surrounding most of the shoreline, requiring these camp facilities to be concentrated in the South ½ of the NW ¼ of section 3, adjacent to Mineral Lake.

The YMCA stated in their February 14, 2023 letter of supplemental information in paragraph 6 that "the conclusion of the county SEPA review process was a mitigated determination of non-significance, meaning that appropriate mitigation measures are available to ensure that our application will not have a significant negative impact on the environment or our neighbors"

The facts however are that the County SEPA determination only pertains to the overlay of Master Plan Resort with no project specific information applied to the SEPA determination. That an MDNS is typical at this stage of zoning change request. It is my understanding that additional SEPA review would be required at the project level to determine impacts to the environment and the community.

The facts of the record lead me to believe the anticipated impacts of this camp on Emergency services, road infrastructure, surface water quality, terrestrial habitat loss, habitat loss of nearshore environment and impacts on fragile aquatic species in the lake can not be mitigated and substantial impacts to the environment and the community will occur as a result of this intense use as a master planned resort and therefore is not in the best interest of the public.