



Community Development

2025 NE Kresky Avenue
Chehalis WA 98532

April 19, 2021

Meredith Cambre
Senior Executive Director
YMCA of Greater Seattle
909 Fourth Avenue
Seattle, WA 98104

RE: Notice of Incomplete Application, Case RZ20-00002

Dear Ms. Cambre:

Thank you for submitting supporting documentation for your application received on April 5, 2021 to amend the Lewis County Comprehensive Plan and Zoning Code to redesignate approximately 643 acres from Forest Resource Land to Master Planned Resort.

The county's Planning Division staff have completed their second review of your supporting documentation. Unfortunately, there remains several outstanding issues detailed in the February 11, 2021 Notice of Incomplete Application that your project representatives did not include. The county will need this information before deeming your initial application complete.

Given this proposal may potentially have a significant impact on the environment and neighboring land uses, Lewis County requires a sufficient level of information to allow adequate review. That information was not provided in the initial application materials and the current subsequent submittals. Responses to questions in the SEPA checklist that delay addressing potential impacts until a subsequent binding site plan process avoids addressing the larger concerns of how the request fits into the larger planning context of this area in Lewis County and how it meets the criteria of a Master Planned Resort overlay zone. The county finds that your second information submittal did not completely answer our specific questions for our analysis as well.

In addition, a complete application for the Master Planned Resort must be consistent with [RCW 36.70A.360](#). It is important to the county that this proposal can meet all federal, state, and local regulations, including all elements of the [Lewis County Comprehensive Plan](#) and [Lewis County Code Chapter 17.20E](#).

In our first Notice of Incomplete Application dated February 11, 2021, the county provided a list of items we needed you to address. I have restated them below to assist you in providing us the level of detail the county needs to review your application.

1. *In order to continue the review, additional detail and analysis relating to how this project would provide sewage disposal, water service, fire protection, and emergency services given current levels of service available in this rural section of the county.¹*

a) *The checklist states on Page 7 that the proposed project will rely on an on-site sewage disposal system to serve a population of approximately 500 people and cites an initial feasibility study that the application did not include. Please provide the county with that study, including information relating to its design.*

Staff Response: The “Mineral Lake YMCA Camp Wastewater Memorandum” and the GeoEngineers letter dated March 23, 2021 were helpful in understanding at a very high level the siting requirements for large on-site septic system (LOSS) on this site. However, these reports do not provide enough detail to ascertain a level of certainty that a LOSS for a project of this magnitude will be consistent with the critical area goals and policies in the Comprehensive Plan. Mineral Lake is an important environmental asset to the county and the protection of groundwater for potable water supply for area property owners is a significant concern. Our analysis of the application will need specific information that provides greater detail on the following items:

- i. The design, specific type, size, and location of each proposed onsite sewage system for each phase of the project.
- ii. Given the extensive presence of glacial drift soils, please provide information on the impacts and the potential location of on-site sewage disposal systems in proximity to camp structures, the lake, wetlands, streams, and off-site wells used for potable water supply.

¹ RCW 36.70A.360(4)(e)

- iii. Phase 3 of the project will depend on a subsurface soil absorption system (SSAS); with the current amount of information available, we are unable to evaluate the feasibility of this system for this project.
- iv. The assumption that at Phase 3 the camp will generate 45 gpd per person is a broad generalization that needs further explanation. The submittal document does not provide detail regarding the similarities or differences of the proposed Mineral Lake Camp with the Camp Orkila or Camp Colman examples.
- v. The county is unclear as to what fully encompasses the proposed phases for the camp's development as described in the final paragraph of page 3 in the Wastewater Memorandum. It describes Phase 3 as adding a Camp B, but it states that the number of campers and staff will remain the same as in Phase 2. Please provide a more detailed explanation of these phases. The memorandum also indicates schematic layouts of the proposed camp completed by Mithun Architects. Include details of how the project might occur in each phase. We need more than conceptual drawings at this phase.

b) The checklist on Page 7 states the project will rely on groundwater from existing wells for its water system, citing sufficient capacity from an initial feasibility study that the application did not include. Please submit this study for review.

Staff Response: The submitted memorandum "YMCA: Mineral Lake Pumping Test Methods and Results" by Matthew Lewis dated March 1, 2021 only provides general information about the existing well on site. This report does not address whether this single well has adequate flow for fire suppression or meets drinking water standards for quality and quantity. There is also no discussion regarding sufficient water rights from this well to meet the camp's use or how the increased draw on this well will affect private wells on other residential properties in the area.

c) The checklist on Page 16 provides no information relating to how this project will achieve adequate levels of service for emergency services given current local capacities and the projected population increase. Please provide additional information that will aid us in assessing how this project will achieve its anticipated service demand considering current resources available in the vicinity of Mineral Lake.

Staff Response: Your second document submission provided no information on how this project will address adequate levels of service for fire protection and emergency services given current local capacities and the project population increase. Your response should also address concerns about how the project will provide physical access to emergency vehicles such as fire trucks and pumpers given topography and current road conditions on- and off-site.

2. [RCW 36.70A.360\(4\)\(e\)](#) requires the designation process to ensure the Master Plan Resort will be consistent the county's critical area protection provisions under [LCC 17.38](#). Given that the checklist states the project intends to rely on an on-site sewage system for a population of 500 people, the county will need analysis as to how the design of this system will or will not affect Mineral Lake as a fish and wildlife habitat conservation area and any wetlands on the subject parcel. Furthermore, discussion as to how stormwater during the construction and operation phases of the proposed Master Plan Resort will protect these aquatic resources.

Staff response: Similar to our concerns previously expressed in this letter about wastewater treatment, the submitted reports provided insufficient detail on stormwater containment and treatment on site, especially in regard to the "natural dispersion" treatment approach mentioned on Page 5 of the GeoEngineers letter. Furthermore, this letter provides no explanation how it derived the conclusion that the wastewater and stormwater conceptual designs will not impact fish and wildlife conservation area, wetlands, or aquifers for potable water supply.

Due to the sensitivity of Mineral Lake and critical areas, the county requests that you submit further analysis of the potential impacts associated with this proposal in relation to the goals and policies relating to critical area protection in the [Lewis County Comprehensive Plan](#).

3. The checklist on Pages 15 and 16 provides no information relating to how the designation process will impact Mineral Hill Road, Mineral Road, and SR 7. Please include information on future traffic generation created by the project; the capacity of these roads to handle increased traffic; and potential mitigation action necessary to address resulting transportation deficiencies.

Staff response: The memorandum "Mineral Lake YMCA Camp-Trip Generation Memo" prepared by SCJ Alliance did not include any information requested that addressed how the project will impact current road conditions, the road's capacity to accommodate increased traffic, or potential mitigation actions

necessary to address transportation deficiencies other than a left turn lane on SR 7 and/or Mineral Hill Road. The statement that the camp will rely primarily on bus transportation to get campers to the site given current road conditions also needs further analysis. Please include these analyses in your next application submittal.

Finally, it would also be useful to receive a copy of the Kidder Creek Orchard Camp traffic study for the county to evaluate the similarities of that project with the YMCA camp proposal.

Final Observations on Submitted Documentation

Please keep in mind that the county is not expecting specific project design at this point. However, it does need a higher level of information beyond a conceptual site plan about the proposal to evaluate its impacts within the context of the goals and policies of the Land Use Element, the Shoreline Element, the Utilities and Capital Facilities Element, and the Transportation Element of the [Lewis County Comprehensive Plan](#). A project of this scope within a rural area of the county necessitates a thorough examination of its affect on neighboring land uses.

In addition, Lewis County needs a higher level of information to show the proposal is consistent with [Lewis County Code 17.20E](#) Master Planned Resorts. We recognize the binding site plan is being deferred to a later date, however, the Master Planned Resort overlay zone cannot be approved without showing consistency with [LCC 17.20E.020](#) - Designation Criteria for Master Planned Resorts, [LCC 17.20E.040](#) - Minimum Standards, [LCC 17.20E.050](#) - Master Plan Approval, and [LCC 17.20E.060](#) - Approved Master Planned Resort.

Finally, the crux to this request focuses on its reasoning as to why this property is better suited as a Master Planned Resort rather than Forest Resource Land. In order to do that, we need details showing this site can meet the applicable federal, state and local policies and regulations mentioned in this letter.

In conclusion, the information requested in this letter is necessary to complete your application so Lewis County may fully evaluate this proposal. If you do not submit the requested information within 90 days of the date of this letter, your application automatically will lapse per [Chapter 17.05.070\(B\)\(1\)](#) of the Lewis County Code. You may request in writing two three-month extensions if the County determines that the required studies or information warrants additional

time. The county cannot consider financial hardship for any extensions of deadlines.

If you have any questions on the issues raised in this letter, please call me at your convenience. My telephone number is (360) 740-2602. You may also reach me email at brianna.uy@lewiscountywa.gov.

Sincerely,



Brianna Uy
Associate Planner

cc: Dan Penrose, SCJ Alliance

Attached: LCC 17.20E.020
LCC 17.20E.040

17.20E.020 Designation criteria for master planned resorts.

Master planned resorts may be developed as a Type III binding site plan application when:

- (1) The comprehensive plan specifically identifies policies to guide the development of master planned resorts;
- (2) The comprehensive plan and development regulations include restrictions that preclude new urban or suburban land uses in the vicinity of the master planned resort, except in areas otherwise designated for urban growth under RCW [36.70A.110](#);
- (3) The county includes a finding as a part of the approval process that the land is better suited, and has more long-term importance, for the master planned resort than for the commercial harvesting of timber or agricultural production, if located on land that otherwise would be designated as forest land or agricultural land under RCW [36.70A.170](#);
- (4) The county ensures that the resort plan is consistent with the development regulations established for critical areas; and
- (5) On-site and off-site infrastructure and service impacts have been fully considered and appropriate mitigation measures have been established. [Ord. 1269 §13, 2016; Ord. 1219 §1 (Exh. A), 2010]

17.20E.040 Minimum standards.

The following minimum standards apply to all master planned resorts:

- (1) A master planned resort, when approved in accordance with this chapter, is established as an overlay zone and, as such, does not alter the existing, underlying zoning designation. Development standards of this chapter shall, as applied to an approved master planned resort, supersede those of the underlying zone.
- (2) Master planned resorts are urban-scale developments located in the rural area.
- (3) The resort, including buffers and open space under the control of the development, is sited on a parcel or parcels of land no less than 40 contiguous acres.
- (4) Existing state or county roads are adequate, or need minimal improvements, to serve the development.
- (5) Capital facilities, utilities, and services, including those related to sewer, water, stormwater, security, fire suppression, and emergency medical, provided on site shall be limited to meeting the needs of the master planned resort. Such facilities, utilities, and services may be provided to a master planned resort by outside service providers, including municipalities and special purpose districts; provided, that all costs associated with service extensions and capacity increases directly attributable to the master planned resort are fully borne by the resort. A master planned resort and service providers may enter into agreements for shared capital facilities and utilities; provided, that such facilities and utilities serve only the master planned resort or urban growth areas.

(6) At least 40 percent of the total of the site area, shall be dedicated to a mixture of permanent open space, natural areas, and/or active recreational areas, excluding streets and parking areas.

(7) Active recreational uses such as golf courses, pools, tennis courts and playing fields shall be provided to adequately meet the needs of the residents and guests of the master planned resort.

(8) The maximum density for residential dwellings including hotel and motel units shall not exceed two units per gross acre of the overall master planned resort. Residential dwellings for long-term occupancy shall be limited to no more than 10 percent of the total number of residential units.

(9) Parking shall be provided for in accordance with a transportation management plan as submitted with the application and approved for the project.

(10) The minimum lot area, width, frontage and yard requirements, setback standards, street standards, and building heights otherwise applying to development in the underlying zone(s) may be modified consistent with the master planned resort, as approved in conformance with this chapter.

(11) The tract or tracts of land included in a proposed master planned resort must be in one ownership or control or the subject of a joint application by the owners of all the property included.

(12) All uses within the master planned resort shall be harmonious with each other through the use of special design, placement, or screening.

(13) Unless otherwise approved in accordance with applicable sign regulations, on-premises signs and off-premises signs shall be designed and erected in conformance with design guidelines, as submitted and approved with the project and off-premises signs shall be limited to those necessary for directional purposes.

(14) Commercial services provided as part of the master planned resort shall be contained within the development and shall be oriented to serve the master planned resort. The protection of public views shall be considered in orienting such commercial services. [Ord. 1269 §13, 2016; Ord. 1219 §1 (Exh. A), 2010]