



July 9, 2021

Lee Napier, Director  
Lewis County Community Development  
2025 NE Kresky Ave  
Chehalis, WA, 98532  
lee.napier@lewiscountywa.gov

Re: Response to Notice of Incomplete Application  
YMCA Mineral Lake Comprehensive Plan Amendment and SEPA Application  
Application No. RZ20-00002

Dear Ms. Napier,

Thank you for your and your staff's continued attention to and cooperative approach to the YMCA of Greater Seattle's application. By letter dated April 19, 2021, the YMCA received a second notification of incompleteness letter from staff at Lewis County Community Development regarding the YMCA's Comprehensive Plan Amendment and SEPA Application (RZ20-00002). This April letter was a follow up to technical information that the YMCA and their consultant team submitted in March to the Community Development Department in response to the County's prior February 11 letter.

By this letter, the YMCA, through and in coordination with its consultant team, further responds, point by point, with as much additional information as possible at this early stage of the application process. The YMCA provides these responses while also noting that the proposed comprehensive plan map amendment is a "non-project" planning level action which reviews the feasibility and appropriateness of the proposed change in designation from Forest Resource Lands to include a Master Planned Resort overlay. Future "project" impacts will be specifically reviewed during the Binding Site Plan process, which will follow and occur if the Master Plan Resort overlay proposal is approved and once the YMCA's project-specific application is submitted.

### **Completeness Determination**

As an initial point, an application is deemed complete when it meets the procedural submission requirements of the County. The YMCA, after consultation with County staff about the most efficient approach, submitted a complete Application for Amendment on December 30, 2020, which included all the submittal requirements for the proposed comprehensive plan and rezone amendment. Accordingly, at this stage in the process, and to move this forward, we believe the County would be correct to recognize that the non-project application should be deemed complete and is appropriate to commence the planning process. This is so even though additional information may be required or modifications may be subsequently undertaken. We recognize that any determination of completeness does not preclude the County from requesting additional information during the review process, and the YMCA is committed to continuing to work with the County and provide it with those details, to the extent practical and feasible.

Additionally, as has been noted, project specific impacts of any future project specific application will be evaluated during site design and as part of the Binding Site Plan and Master Planned Resort approval



process, including consideration of any appropriate conditions or mitigation. It is at that time, that it would be appropriate for the County to review and confirm the criteria set forth in RCW 36.70A.360 and chapter 17.20E LCC are fully satisfied.

**Supplemental Responsive Information**

Notwithstanding the above, the YMCA is committed to providing the County with as much additional requested detail now, as is feasible, in order to support the County’s review process. The remainder of this letter provides additional substantive details in response to the County’s requests. Below is a complete chain of County requests, including the County’s February 11 comments, a description of the YMCA team responses, and further responses now to the Second Notice of Incomplete Application in the County’s April 19 letter.

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February 11, 2021 County Comment:

*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.*

**YMCA March 2021 Response:**

The YMCA provided the County the following documents which described the siting requirements for large on-site septic system (LOSS) on this site:

- GeoEngineers, *Geotechnical Engineering Services Report* (March 16, 2021)
- GeoEngineers, *Comment and Review Letter* (March 23, 2021)
- SCJ Alliance, *Mineral Lake YMCA Camp Wastewater Memorandum* (March 25, 2021)

April 19, 2021 County Response:

*. . . 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. . . . 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.*
- 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.*

**YMCA Supplemental Response to April 19 Comments:**

In response to the April 19 letter, GeoEngineers and SCJ provide the following additional detail in response to the County's comments:

- i. With respect to further details regarding the "design, specific type, size, and location of each proposed onsite sewage system for each phase of the project" the YMCA supplements its prior information with the following explanatory response and additional detail:
- o Test pit explorations and an infiltration feasibility assessment are summarized in the March 16, 2021 Geotechnical Report. Two general soil profiles were observed in the test pits: (1) residual soils (clay, sand and gravel) overlying basalt bedrock, and (2) glacial drift soils (silt, sand and gravel). In general, infiltration appeared to be feasible in portions of the site. Based on the report, it is reasonable to anticipate slow to very slow design infiltration rates within residual soils; more favorable rates will be attained within glacial drift soils. Clay and intact bedrock should be considered to have slow infiltration rates while glacial drift soils will have higher rates compared to the clay and intact bedrock. Further, the report supports a conclusion that vertical and horizontal separations (e.g., depth to rock, depth to groundwater, distance from water sources, etc.) will likely control septic and stormwater infiltration design. Systems in the residual soils and bedrock will require systems accommodating impermeable bedrock. Systems in glacial drift soils will likely need to accommodate shallow groundwater.
  - o Based on results of the infiltration feasibility assessment described above, preliminary project design considers on-site sewage systems. Preliminary design, type, size and location information for the Phase 1 and Phase 2 and 3 wastewater management systems have been provided in the SJ "Wastewater Memorandum" dated March 25, 2021 and are also described in the GeoEngineers Plan Review Letter dated March 23, 2021. These preliminary locations target more favorable infiltration areas identified in the test pit explorations described above. Final siting and sizing of wastewater treatment systems will be determined at 30 percent design and will incorporate additional data such as site-specific infiltration testing of subsurface soils (e.g., Pilot Infiltration Tests) and sizing calculations based on maximum daily flow, infiltration capacity of site soils at the location of the facility, and accommodation for controlling factors such as impermeable layers and shallow ground water.
  - o Upon acceptance of the Comprehensive Plan Amendment to add a Master Plan Resort Overlay to the Mineral Lake Camp site, SCJ will finalize the design of the



Phase 1 septic system. Based on preliminary maximum daily flow calculations (1,500 gallons per day [gpd]) the Phase 1 septic system will be designed in accordance with Lewis County and Washington State guidelines and requirements and reviewed by the Lewis County Health Department. Based on preliminary maximum daily flow calculations, the future Phase 2 and 3 wastewater system for the YMCA project will be a Large On-site Sewage System (LOSS) which will be designed in accordance with Washington State Department of Health (WSDOH) guidelines and requirements. The Phase 2 and 3 system will need to be approved and permitted by WSDOH.

- We anticipate there will be enough area on site such that on-site infiltration facilities can be sized as needed to meet requirements based on maximum daily flow and infiltration capacity of site soils.
  - All required analyses and reports will be completed as part of the approval process. It is our opinion that additional design and analysis is premature at this time given that the project is not yet in the design/permitting phase.
- ii. Regarding glacial drift soils, final siting and sizing of wastewater treatment systems will be determined at 30 percent design and will incorporate additional data such as site-specific infiltration testing of subsurface soils (e.g., Pilot Infiltration Testing) and sizing calculations based on maximum daily flow and infiltration capacity of site soils. As stated above, the wastewater management systems will be designed in accordance with Lewis County, Washington State and WSDOH guidelines and requirements to ensure no impacts to critical areas or other off-site wells. The wastewater systems will be designed in a manner that is consistent with the critical area goals and policies in the Comprehensive Plan. All required analyses and reports will be completed as part of the approval process.
- iii. As stated in the SCJ *Wastewater Memorandum*, the Phase 3 SSAS areas have not been determined at this time. Additional site-specific testing and detailed design is needed and will be completed once the project moves to the design phase. Phase 3 is not being proposed at this time and would come at a later date. All required analyses and reports will be completed as part of the approval process. As stated above, the SSAS will be designed and sited only in accordance with Lewis County, Washington State and WSDOH guidelines and requirements to ensure no impacts to critical areas or other off-site wells. Our technical reports confirm the feasibility and suitability of subject soils east of the Phase 3 area for the SSAS. Additional soils testing will be conducted as part of final siting and approval.
- iv. Regarding the design per person water use, as stated in the SCJ *Wastewater Memorandum*, the 45 gpd per person (gpd/p) was used as an estimate for feasibility and preliminary design based on review of comparable camps. As the *Wastewater Memorandum* notes, this number was based on review of water usage at two other similarly situated comparable YMCA Camps (Camp Orkila at average of 47 gpd/p and Camp Colman at estimated use at 27gpd/p), and further supported by USEPA Wastewater Treatment Systems Manual Table 4-9 Typical wastewater flow rates from recreational facilities which lists a range of 35 – 50 gpd/p for “Children Camps,” it also lists 45 gpd/p as a typical flow. The Department of Ecology will ultimately make a decision on the authorized and



necessary annual quantity (Qa) to be authorized by the water right permit, but the 45 gpd/p estimate is what we believe they will accept pending additional compelling evidence that more water is needed. The 45 gpd estimate is consistent with Department of Health guidelines that suggest Park-type use around 25 gpd/p, and “low-end” camps that assume centralized bathing and toilet facilities at 35 gpd/p.

- v. The camp program will evolve in stages, influenced by the speed with which the YMCA can raise the necessary funds. In Phase 1 (1-3 years from purchase) the YMCA will begin to offer backpacking and tent camping trips for groups of 10 campers and two staff. Part of this phase may include a small welcome center and trail to the access the Mineral Lake waterfront. The development footprint of this work would be approximately three to four acres. In Phase 2 (3-5 years from purchase), the YMCA will invest in the infrastructure necessary to operate a camp on site, including on-site sewer, roads and other improvements to support the growth. This Phase may include a centralized lodge for dining and camp gatherings while the YMCA continues the small group rustic camping on site. In Phase 3 (5-10 years after purchase), the YMCA plans to fully build out a youth environmental learning center in partnership with the Nisqually Tribe. This includes the addition of cabins for sleeping and other traditional camping activities such as arts and crafts. Completion of all three phases will accommodate about 400 campers and 100 staff on site within an estimated footprint of seven to nine acres.

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February 11, 2021 County Comment:

*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.*

**YMCA March 2021 Response:**

The YMCA provided the County the following document regarding groundwater investigations and feasibility related to future water supply needs:

- Aspect Consulting, YMCA: Mineral Lake Pumping Test Methods and Results (March 1, 2021)

April 19, 2021 County Response:

*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.*



**YMCA Supplemental Response to April 19 Comments:**

Aspect Consulting’s analysis analyzed the aquifer capacity based on pump test results from the existing well on the property, which served as the test well for this investigation. It further included observations at a nearby observation well to assess any drawdown. Aspect concluded that the existing well will provide sufficient supply for the camp at the Phase 1 buildout and that the aquifer is capable of supporting the camp’s drinking water needs. Based on Aspect’s evaluation of the site, and assuming the wells are sufficiently spaced, Aspect concluded that any additional wells needed for the project can be expected to produce similar quantities as the camp continues to expand into full buildout.

Regarding fire flow and fire suppression, the proposed wells will supply water to new water reservoir tanks. A tank is proposed for Phase 2 and another for Phase 3. These tanks will hold water for fire flow. Our current plans assume that the required fire flow will be 1,500gpm for two hours at 20psi. Tanks will be designed to supply this fire flow by gravity flow using adequately sized water mains, fire hydrants and building fire sprinkler systems as required by County Fire Marshall and applicable building code regulations, which would be reasonable mitigation conditions on any approval.

Regarding drinking water standards, water supply wells will need to meet all applicable drinking water standards and be approved by WSDOH, including all applicable design standards, capacity, and treatment, if necessary, pursuant to chapter 246-290 WAC, which would be reasonable mitigation conditions on any approval.

To support the above, the YMCA is actively pursuing a water right permit and has been working closely with the Department of Ecology to ensure that our approach will be successful. Ecology does not require that the actual production well be constructed prior to permit issuance, and we are basing our technical findings from testing the existing onsite well. Because water right permits are generally issued before the production well is drilled, we see no conflict in not already having a production well. The well that was tested was productive and there are ample areas within the property to drill additional wells as needed. Ultimately, the YMCA envisions drilling two or more wells for this project, which is consistent with our pending water right application (Application No. G2-30759). Multiple wells will likely be provided for more operational flexibility – which is important given the size of the property. Aspect is confident that we have enough information to address Ecology’s standards which include physical capacity, legal/regulatory considerations, and most importantly a finding that we will not be impairing other water users, including private wells on other residential properties in the area.

The YMCA is processing Application No. G2-30759 through Ecology’s cost reimbursement program. The draft Report of Examination (ROE) which supports the issuance of a water right permit for domestic supply, is ready to file with Ecology for their preliminary review. This ROE is ready to be submitted to and acted on by Ecology once the County issues its SEPA threshold determination.

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**February 11, 2021 County Comment:**

*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.*



**YMCA March 2021 Response:**

The Project Descriptions in this submittal notes that a fire lane/access road will connect the two camps (Camp A and Camp B). New fire lanes will be placed throughout the camp areas as required by Lewis County Fire Marshal. Further, the Project Description within the Phase 1 ESA notes that Camp Mineral Lake will expand the existing access road from Mineral Hill Road based upon the projected volumes of passenger vehicles and delivery trucks. The private road system will be designed to meet applicable standards for fire apparatus and emergency vehicles.

April 19, 2021 County Response:

*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.*

**YMCA Supplemental Response to April 19 Comments:**

We are committed to providing these details in the detailed development plan for the site. The YMCA's other camps are also located in predominantly rural areas and strategies and agreements are in place for the provision of services to those facilities.

The plan for the YMCA site includes upgrading of the access road into the site and upgrades to several existing on-site access roads, phase by phase, in order to meet County roadway standards for emergency vehicles. These improvements include widening roads to 20 feet, on a phase by phase basis, and keeping roads below the maximum allowed grade per County standards. Vehicle turnarounds will also be added where needed. In addition to this, there will be several new 20-foot wide fire lanes that would provide access to proposed buildings, again phase by phase. Many of these lanes will only be used for maintenance vehicles only but will be full depth all-weather pavement to allow for emergency vehicle use. These fire lanes in phase 2 and 3 will also have fire hydrants placed, in accordance to County Fire code, to allow for full fire hose coverage for all proposed buildings. In addition, if any of the larger buildings are of a size and construction type that would require fire sprinklers, the new water mains and water reservoir(s) will be capable of supplying the necessary fire flow at state mandated pressures.

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February 11, 2021 County Comment:

*. . . 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.*

**YMCA March 2021 Response:**

The YMCA provided the County the following document regarding wastewater and stormwater investigations and feasibility:

- GeoEngineers, *Geotechnical Engineering Services Report (March 16, 2021)*



- GeoEngineers, *Comment and Review Letter* (March 23, 2021)
- SCJ Alliance, *Mineral Lake YMCA Camp Wastewater Memorandum* (March 25, 2021)

Specifically, the GeoEngineers March 23, 2021 Comment and Review Letter described the stormwater containment and treatment on site.

April 19, 2021 County Response:

*. . . 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.*

**YMCA Supplemental Response to April 19 Comments:**

Current engineering design and analysis (including stormwater design) considers general site feasibility for the proposed improvements. Feasibility was based, in part, on subsurface conditions observed in test pit excavations and a reconnaissance level critical areas survey completed at the site. Based on the observed site conditions and SCJ’s experience evaluating stormwater treatment in similar soil conditions, we anticipate on-site infiltration facilities can be sited to provide required minimum lateral separations and not impact critical areas at the site. One of the major considerations that supports this conclusion is the abundant amount of space available to design and build infiltration systems for stormwater and septic systems.

Final siting and sizing of improvements (including wastewater treatment systems) will be determined at 30 percent design and will incorporate additional data such as site-specific infiltration testing of subsurface soils (e.g., Pilot Infiltration Tests). The wastewater and stormwater systems will be designed in a manner that is consistent with the critical area goals and policies in the Comprehensive Plan.

- All required analyses and reports will be completed as part of the wastewater management design and approval process, including critical areas impacts analysis. The wastewater management systems will be designed in accordance with Lewis County, Washington State and WSDOH guidelines and requirements, which would be reasonable mitigation conditions on any approval.
- All required analyses and reports will be completed as part of the stormwater management design and approval process, including a complete storm drainage plan and an evaluation of the infiltration capacity of site soils to determine design infiltration rates. Stormwater drainage will be designed in accordance with the current Washington State Department of Ecology (Ecology) Surface Water Management Manual for Western Washington, which would be reasonable mitigation conditions on any approval.

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February 11, 2021 County Comment:

*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.*

**YMCA March 2021 Response:**

The YMCA provided the County the following document regarding traffic impacts and trip generation:

- SCJ Alliance, Mineral Lake YMCA Camp-Trip Generation Memo (March 30, 2021)

Among other things, this Trip Generation Memo addressed future traffic generation, capacity and potential mitigation action that might address the existing deficiencies.

April 19, 2021 County Response:

*The memorandum 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.*

**YMCA Supplemental Response to April 19 Comments:**

We have attached the Kidder Creek Orchard Camp traffic study to this letter as requested. In summary, the Kidder Creek Orchard Camp, located in northern California, is currently permitted for up to 165 guests (staff numbers not included) at any given time. The proposed master plan includes increasing the total number of guests and staff to a maximum occupancy of 844 persons within the camp. This is well over twice the size of the YMCA camp proposal at Mineral Lake, but the forecasted split between single vehicle and bus use is comparable. The Kidder Creek Orchard Camp currently utilizes buses and will likely continue to do so in the future, potentially expanding the bus service options and/or the number of attendees that could reasonably arrive/depart via buses.

For comparison purposes, the bus traffic to the YMCA's Camp Colman in 2019 averaged about 90 campers per bus, with two or three buses used per session. At Camp Colman in 2019 there were 1,354 total campers and 51% rode the bus to arrive at the camp. In 2019 for Camp Orkila, there were an average of eight busses per session for arrival and departure, each carrying 50 campers. When compared to total number of campers attending each session, it was found that 85% of campers arrived at Camp Orkila on a bus. Total counts for the 2019 sessions for both camps were 5,495 kids. Of that number, 4,210 or 76.6% arrive/depart at the camp via YMCA buses.

Compliance with Lewis County Code 17.130.020(5) would be a reasonable mitigation condition on any approval.

As part of any subsequent analysis and studies as may be required by Public Works, the YMCA can procure additional data for presentation during the planning commission review. The YMCA can procure the existing traffic volume data two ways: first we could collect weekend trip rate this summer (time delay), or second we could use WSDOT basic seasonal adjustment rates to average out the camp



across the week and not focus on a specific day of the week (not as strong data). Please let us know which method the County prefers. Either method will be challenging to forecast as the vehicle volumes in this area are very low and a series of assumptions will need to be made.

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April 19, 2021 County Response:

*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.*

**YMCA Supplemental Response to April 19 Comments:**

We agree that any application needs to meet applicable federal, state and local policies. The policies and codes specifically mentioned in the letter include RCW 36.70A.360 Master Plan Resorts, Lewis County Code 17.20E.020 Designation criteria for master planned resorts, and LCC 17.20E.040 Minimum standards. The County’s April 19 letter recognizes that the binding site plan is being deferred to a later date. However, the County takes the position that the consistency with each of the above must be shown now. Yet, these provisions govern when and how master plan resorts “may” be developed, see LCC 17.20E.020, and establish minimum standards that would apply to actual proposed master planned resorts. See LCC 17.20E.040. The YMCA agrees that all of the criteria and standards must be met for the YMCA to ultimately receive approval. However, they are not preconditions to adopting the necessary comprehensive plan amendments and zoning designation of the overlay zone that would allow processing of the future deferred binding site plan application. This is consistent with the GMA provisions, which similarly establish criteria that must be met for a master plan resort to “be authorized” by the County. See RCW 36.70A.360(4).

In order to be as responsive as possible now, the YMCA provides the following response addressing each applicable provision. Further, the specific rationale regarding the appropriateness of YMCA’s proposed map amendment to overlay the Forest Resource Lands with a Master Plan Resort overlay was included in our original application materials and is also supplemented below.

**CODE REFERENCES AND RATIONALE**

*LCC 17.20E.020*

LCC 17.20E.020 provides specific criteria for development of master planned resorts within appropriately designated areas, providing specific conditions consistent with GMA requirements. See also RCW 39.70A.360. Lewis County Code requires master planned resorts be processed as Type III binding site plans. Approval of a project specific master planned resort would require a quasi-judicial action and an open record hearing and decision before the hearing examiner. LCC 17.05.040(1)(c). The master planned resort binding site plan application and review and approval process would ensure all applicable federal, state and local policies and regulations are met.

*LCC 17.20E.020(1)*

The Lewis County Comprehensive Plan specifically identifies policies to guide development of master planned resorts. See Comprehensive Plan at LU-16; see also Comprehensive Plan at LU-23 (Recreation and Tourism in Rural Areas).

*LCC 17.20E.020(2)*

The Lewis County Comprehensive Plan and county development regulations specifically restrict new urban or suburban land uses in the vicinity of the master planned resort. See Comprehensive Plan at LU-23 (Policy Rural 10.3).

*LCC 17.20E.020(3)*

The mountainous setting of the site combined with extensive shoreline habitats, ravines, wetlands, and streams makes timber harvest challenging in this area for a range of environmental reasons. While challenging, timber harvesting does not ascribe to the same regulations as that of other zoning types. This results in greater habitat degradation, higher harvesting costs, and less returns than that of other regions. Transitioning the site to a Master Planned Resort would allow for greater environmental protections along Mineral Lake, a more reflective use type for already existing and established use types within the community of Mineral, and a visual and physical buffer for recreation-based tourists and residents alike. The proposed area included in the designation amendment would permit the conversion of one half of one one-hundredth of total Forest Resource Land (0.0005) in Lewis County to a Master Planned Resort overlay designation. Furthermore, the site has been heavily logged and will not produce marketable Douglas Fir for at least fifty years.

*LCC 17.20E.020(4)*

A Master Planned Resort overlay area is specifically contemplated and authorized under the County's Comprehensive Plan and the Growth Management Act and would be subject to all applicable development requirements. Any proposed actual master planned resort project would be required to comply with all existing requirements for environmental analysis, protection, and mitigation measures in the County's development regulations and Comprehensive Plan, and in other applicable local, state, or federal laws or rules. In addition, the various studies produced assert that the proposed conceptual YMCA camp would comply and be consistent with all federal, state and local development regulations established for critical areas.

*LCC 17.20E.020(5)*

Prior to approval of a project specific master planned resort would only occur after all on-site and off-site infrastructure and service impacts have been fully considered, and appropriate mitigation measures established, if any. The various feasibility studies associated with the proposed conceptual YMCA camp have fully considered on-site and off-site infrastructure and service impacts. The County has sufficient information in which to establish appropriate mitigation measures, if any, for the proposed change and amendment from Forest Resource Land to Master Plan Resort Overlay. Any project specific impacts and mitigation measures would be considered and addressed as part of the master planned resort binding site plan review and approval process consistent with all applicable federal, state and local development regulations

*LCC 17.20E.040*

LCC 17.20E.040 provides the minimum standards that would apply to all master planned resorts within an approved overlay area. These minimum standards would be required conditions of any future project specific proposal. The master planned resort binding site plan application and review and approval process would ensure all applicable federal, state and local policies and regulations are met.

*LCC 17.20E.040(3)*



The contiguous acreage of the site is 643, well over the 40-acre requirement.

*LCC 17.20E.040(4)*

Traffic scoping study shows existing state/county roads are adequate to serve the proposed master planned resort overlay area. The study suggested a left-hand turn lane at SR7 and/or Mineral Road might improve safety.

*LCC 17.20E.040(5)*

The prospective capital facilities, utilities and services are planned to only meet the needs of the YMCA camp and will not be sized to allow any other connections. Initial agreements with service providers are underway and those providers have confirmed the capacity to serve the camp.

*LCC 17.20E.040(6)*

Using the County's Binding Site Plan process, YMCA will evaluate a phased build-out within 10-15 years of purchase. Completion of all phases will accommodate up to 400 campers and 100 support staff with an estimated footprint of 7-9 acres. Even at the 9-acre estimate, 643-acres (98.6%) of the site will remain in a natural state, far exceeding the required 40% open space dedication.

*LCC 17.20E.040(7)*

The proposed use is an overnight camp for kids and will have ample recreational uses to meet the needs of the guests.

*LCC 17.20E.040(8)*

At full build-out of all phases, rustic cabins and designated tent sites will accommodate the projected 400 campers and 100 support staff. While all campers and the vast majority of on-site support staff will be short-term visitors, an essential crew of camp stewards will remain on site for extended periods to ensure the smooth and safe operation of the site. Hotels and motels are not included within any phase of this proposal. Longer-term caretaker accommodations will not exceed 10 percent of the total number of dwelling units.

*LCC 17.20E.040(9)*

Parking will be provided as required during the Binding Site Plan approval process.

*LCC 17.20E.040(10)*

The Master Plan Resort (MPR) designation will overlay 643 acres of property will afford ample flexibility to accommodate the minimum lot area, width, frontage and yard requirements, setback standards, street standards, and building heights as may be required by the county during approval of the master planned resort and subsequent Binding Site Plan.

*LCC 17.20E.040(11)*

The YMCA of Greater Seattle will be the owner of the 643 acres covered by the MPR Overlay.

*LCC 17.20E.040(12)*

The bulk of the site will be used for activities and lodging for an overnight camp for youth. Those areas used for utilities (wastewater treatment) or logistics (parking, loading/unloading) will be situated in a manner that will not conflict with the camp function, form or rustic setting.



*LCC 17.20E.040(13)*

All signs will be designed and placed to conform with design guidelines.

*LCC 17.20E.040(14)*

No commercial services are proposed as part of the MPR Overlay designation or subsequent Binding Site Plan application. All services at the property will be for the sole use by the YMCA Camp and their registered guests.

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**STATE MASTER PLAN RESORT GUIDELINES FOR REFERENCE**

RCW 36.70A.360

RCW 36.70A.360(4) provides that a County may only authorize and approve master planned resort if the following conditions are met:

- (a) The comprehensive plan specifically identifies policies to guide the development of master planned resorts;
- (b) 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;
- (c) 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 forestland or agricultural land under RCW 36.70A.170;
- (d) The county ensures that the resort plan is consistent with the development regulations established for critical areas; and
- (e) On-site and off-site infrastructure and service impacts are fully considered and mitigated.

Each of these criteria are mirrored in the existing Lewis County Code provisions and would be an express prerequisite to and condition of approval of any future project specific master planned resort binding site plan application and approval process.

I'm happy to meet with you or other County staff at your earliest convenience to determine a path forward. If you have any questions or comments, please call me at 360-791-4292. Thank you.

Respectfully,  
SCJ Alliance

Dan Penrose, AICP  
Principal, Planning Manager

cc: Meredith Cambre, Senior Executive Director, YMCA of Greater Seattle