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Re: Supplemental Information  
YMCA Mineral Lake Rezone Application  
Application No. RZ20-00002

Dear Ms. Brooks and Ms. Napier:

The YMCA of Greater Seattle (“YMCA” or the “Y”) submits this letter providing supplemental information and comments for the record regarding our land use application related to the proposed Mineral Lake YMCA Rezone. We ask that this letter be included in the public comments and record in this matter and provided to the Board of County Commissioners for their review.

As the applicant in this land use action, the YMCA appreciates the opportunity to further engage with the County as the Board reconsiders its original decision regarding our application for a master plan resort overlay on 500 acres of property we own on the northeast shore of Mineral Lake. We are not applying for project-level approvals at this point; our application is to determine whether the rezone and our proposed use for our property is an appropriate one under applicable land use principles. The findings presented in the staff report Section E confirms that the proposed use meets those requirements.

## Background

As you know, our intention is to build a camp and center for outdoor learning, composed of cabins and support buildings spread across a small portion of the subject property. Our current plan is that remainder of the 500 acres – along with another 1,600 adjacent acres that we now own that are not part of this application – would remain in their natural state and would be used in the practice of sustainable forestry. Even with the approved overlay, our plan is that the underlying zoning will remain Forest Resource Land, and we envision that the vast majority of our property will remain undeveloped. To put the size of proposed overlay into context, more than 72% of all land in Lewis County is designated Forest Resource Land, so the 500 acres receiving the Master Plan Resort would change less than one half of one percent (0.005) of the total Forest Resource Land in the county.

In contrast, there currently is no land in Lewis County designated as a Master Planned Resort (MPR) area to support enhanced recreational activities and the tourism economy. This was a county need identified in the comprehensive plan. Confirming the recommended MPR designation for our property would meet the intent laid out by the County in creating this use option.

However, a number of uses that would normally and otherwise be allowed within an area designated as MPR land are not relevant to this application. As such, we support the staff recommendation to specifically exclude options like golf courses and condominium developments and retain only those uses that align with our much smaller scale intentions. These important restrictions will reinforce our contention and the Planning Commission's finding that this is at the same time both the best use of the property, and the least intensive or impactful development option for the area.

Both the county planning staff and the Planning Commission have recommended approval of our application. 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. Additionally, the staff and Planning Commission conclusion was that our application successfully met the four criteria for approval for MPR designation.

It is important to remember that this application and the recommendations you have received from staff and the Planning Commission related to whether the MPR designation, as conditioned, is an appropriate one for this property. While this is not a project-specific application, we are aware that a number of issues have been raised about the design and operation of the camp. We know that we will be required to address details regarding design and development requirements as well as mitigation measures in the next phase of project planning. I can assure you that as issues arise during the project-specific planning, we are prepared and committed to responding to them and resolving them in ways that minimize impacts on our neighbors and provide certainty for the county.

## **Non-Project vs. Project Level Review**

Throughout the review process to date, the Y has provided extensive documentation to comply with the requirements of the county's SEPA review and to answer additional questions about the property and our plans for it. Some of that material was created as we did our own due diligence on the property's suitability for a camp before we acquired the property. While that information is more germane to the eventual site-specific permit applications, in the spirit of transparency, we have made it available in the record for your review now. I would like to offer some additional comments to highlight some of that information and respond to the most-asked questions regarding our proposal, again with the understanding that many of these questions are project-specific issues beyond the scope of this application.

As a condition of Lewis County's SEPA determination, the Y will be required go through MPR and binding site plan (BSP) review and permitting, and per the MDNS, will be entering into a site-specific development agreement that spells out what measures we must take regarding important issues like water supply, wastewater treatment, transportation, and emergency response services. If we fail to meet the identified requirements, we won't be allowed to build the camp, and if we fail to build the camp, the MPR overlay would be removed and the land would revert to its underlying Forest Resource Land designation.

The detailed answers to some of the questions being asked right now will not be available until we move into that next planning phase, when we will work with the planning staff to address site-level impacts and complete that binding site plan. That work cannot begin until we have secured the overlay because planning for a camp can't take place until we know that a camp is going to be an allowable use. That limitation aside, I would like to share what we currently know on some of the most important questions being asked.

## **Need for Additional Outdoor Youth Camps**

First, is there a need for another camp facility like this in Western Washington? The answer is clearly yes. The Y's existing camps, Orkila and Colman, are significantly oversubscribed, and we turn away far too many youth and families each year. Often our camp slots are filled a year in advance, and there are hundreds of kids on the waiting list for summer camp sessions. There also continues to be strong demand for outdoor education experiences for children of all ages, and we are at capacity to serve schools looking to provide those experiences to their students. This demand has grown and will continue to grow as a result of the state policy of providing quality outdoor education for all students in 5<sup>th</sup> or 6<sup>th</sup> grade, because there are not enough facilities to accommodate these requests. A [study conducted for the Legislature](#) found that students from disadvantaged backgrounds benefited from outdoor programs the most, and that universal access would reduce financial barriers and increase attendance.

Local camps like Cispus Learning Center here in Lewis County and the Outdoor School Consortium are working to address the gap with the help of groups like the YMCA, and we are hoping to make a larger contribution to the effort. Of note, Cispus has been and continues to be a strong supporter of the YMCA's proposal and has submitted comments of support in the record.

We know that some commissioners have had questions about the outdoor education curriculum that will be offered at the camp at the Mineral Lake property. While this subject is well beyond the scope of a land use application, we are providing some examples, including sample lesson plans, from one of our existing facilities to provide you with a sense of our approach. The exact details of Mineral Lake sessions will be tailored to the unique lake and forest environment at the camp. They will comply with Washington state educational standards, and will be developed in coordination with local schools, outdoor education specialists, and other partners when the creation of our facilities is further along and preparations are underway for welcoming campers.

The kind of camping and outdoor education experiences provided at a Y camp are more important than ever. Time spent outdoors is connected to positive mental and behavioral health, and too many kids spend too much time behind their screens. In a recent study, parents of children 8-12 years old say their kids spend three times as many hours with technology than they do outdoors. Campers learn to overcome challenges as individuals and as a group, using problem solving, curiosity, self-discipline, leadership, decision-making, and confidence in their own capabilities. Additionally, some of the more common causes of depression among youth, such as social isolation, lack of self-confidence, and lack of motivation, can be addressed in physically active, socially stimulating and cognitively challenging activities like those available in a camp setting. Finally, youth who experience the outdoors are more likely to respect and steward the land, understanding how nature and communities are connected.

### **Lewis County Interests and Benefits**

Additionally, we know you have a particular duty to represent the interests not only of the residents of Mineral but all those living in Lewis County. With that in mind, we have been considering what other commitments we can make to enhance the benefits we will provide to your constituents.

First, questions have been raised about whether Lewis County youth and families will be able to take advantage of having a camp nearby. To ensure this benefit, we are willing to commit to providing Lewis County residents with an early registration window for all youth and family camp sessions held at Mineral Lake. This will ensure that interested local residents have every opportunity to participate in camp sessions in their own county. Our range of financial aid programs, which are available due to the generosity of donors who give to the Y, will also be made available to ensure that ability to pay is not a barrier to participation.

Second, there have been concerns about the impact ownership of the land by a non-profit organization like the Y will have on property tax collections. Despite the fact that it is a not-for-profit organization, the YMCA does not intend to apply for a property tax exemption on the portion of the property used in support of its non-profit mission. As a result, we will be paying property taxes on the land we have acquired. Additionally, because we will continue to maintain the vast majority of the site as a working forest, we also will continue to pay timber taxes on revenue from timber sales.

Finally, questions have been raised about public access to the property. While controlling access to any property is a basic property right and not a function of zoning, we recognize the importance of access for many residents of Mineral and the rest of Lewis County. We plan to form an advisory group during the next phase of project applications, and our intention would be to invite community representatives to join us to provide recommendations and discuss issues as the Y considers various options regarding access and other issues.

These specific commitments are in addition to and will enhance other general public benefits for Lewis County residents, like economic development and job creation. We expect that local companies will be able to secure contracts for work in creating the camp, and that local youth may pursue summer jobs as counselors and members of our maintenance crews.

### **Water Availability and Water Resources**

Another important consideration is water availability. The YMCA's proposed water use will not affect the surrounding community's water supply, and will not impair other water users, the underlying aquifer, or the watershed's rivers and streams. The YMCA's conservatively estimated demand, based on approximately 500 campers and staff, is only a small fraction of the aquifer system's natural yield and is in fact very small compared to other types of uses such as irrigation, or municipal supply. In fact, the Y's proposed camp would use less water than comparable residential development or more intensive uses the property could be put to. Given the more than 2,000 acres we own, our property is contributing approximately 2,500 acre-feet of recharge to the sub-basin compared to our projected consumption of approximately 2 acre-feet. Again, this difference underscores that our proposal is the least impactful form of development for the property.

In Washington, the Department of Ecology (Ecology) is tasked with the responsibility of making decisions regarding water supply. Given how critical water is to the viability of this project, the Y took the proactive step of initiating early studies to determine whether the property would be suitable for the construction and operation of a youth camp and not impair neighboring water users. The initial study was conducted by Aspect Consulting and the results were shared with Ecology. Upon reviewing the results, Ecology determine that there is sufficient water to serve the site, and that the Y's water usage will not impair other users or the watershed's streams and creeks. Ecology's investigation recognized that most of the camp's water use will be non-consumptive, with approximately 90% of its withdrawals being returned to groundwater system and likely to provide instream flow augmentation. Ecology further recognizes that the YMCA's proposed retention of significant open space and forested acreage creates passive benefits and mitigation to any water impacts. Under the state Water Code, Ecology may only issue new water right permits if it determines that the new withdrawal is legally and physically available and that it will not impair existing rights. [RCW 90.03.290(3).] In analyzing impairment, Ecology must make a determination as to whether existing water rights, including adopted instream flows, may be impaired by the withdrawal and proposed use. Ecology found that no other wells are known to exist within about 1,000 feet of the proposed YMCA well, and any minimal drawdown within the bedrock aquifer is expected to diminish with increased distance away from the well. Based on the available water columns determined for nearby wells, no impairment is reasonably expected to occur from approval of the proposed request. Ecology's findings are summarized in its Final Report of Examination G2-30759 dated November 8, 2021

(ROE). If any person or party had any concerns about Ecology's conclusions, ample opportunity was available to protest the application, comment to Ecology, or appeal Ecology's decision. Ecology received no protests on the YMCA's application and no party appealed Ecology's decision.

On January 11, 2022, the State of Washington Department of Ecology (Ecology) issued the YMCA Water Right Permit No. G2-30759.

### **Water Quality (Arsenic)**

The YMCA separately takes this opportunity to supplement the record and provide additional comments and context regarding water quality concerns, specifically including arsenic. The YMCA understands and is well aware of the existing arsenic impacts in area groundwater.

According to media accounts, when arsenic was discovered in private wells in the Mineral community in the early 2000s, the County's proposal at the time was to create a special purpose district and Group A public water system to serve the Mineral area, which was rejected by the community. The arsenic impacts previously noted in shallow, largely hand dug wells, are not subject to the same stringent monitoring, testing, and treatment requirements of public water systems. However, the YMCA does propose, and is required under Department of Health (DOH) regulations to develop a Group A public water system to serve the camp. See WAC 246-290-020. All drinking water issues (including arsenic) would be addressed and regulated by DOH, and if any issues were identified. Group A water systems have robust regulatory requirements for obtaining source approval and for ongoing testing, reporting, and treatment, as required. All such issues will be reviewed and regulated DOH in accordance with all applicable state and federal guidelines.

The County has already recognized and addressed this issue by flagging it for additional detailed review at the project stage, when more information is available, and a specific project is proposed. For example, the record reflects Lewis County Public Health & Social Services comments that "[t]he project will require a well site inspection by Lewis County Environmental Health and subsequent water system review and approval by the Washington State Department of Health Office of Drinking Water Southwest Region." The MDNS also requires that "arsenic testing" must be addressed as part of the project-level review and the required Master Planned Resort (MPR) and Binding Site Plan (BSP) application, and that mitigation associated with any such project-level impacts would be addressed at that time.

Being proactive, the YMCA has done preliminary testing which showed arsenic levels not inconsistent with other wells in the area (revealing 40.3 ppb compared to area wells tested at between 12 and 140 parts per billion). These test results are not surprising. Of further note and for point of reference, while the test results revealed some exceedances, the measured arsenic impact at the YMCA's test well (40.3 ppb) are less than County MCL standard (50 ppb) for existing Group B systems constructed before January 1, 2014. LCC 8.55.220(4). Notable, final well siting has not occurred, and the YMCA would perform additional investigation and testing at the project stage and prior to any water use or development. Here, pursuant to DOH regulations, prior to operation, the YMCA would develop a water system plan under the oversight and regulation of the DOH, which would address all issues, including arsenic,

applicable to a public water supply system, including any required testing, reporting, and treatment. As a public water system, the YMCA's water use would be subject to greater regulation, oversight, and scrutiny than individual resident wells. Treatment for arsenic is not uncommon, and utilizes well-understood and available technology and methods that can be scaled for the YMCA's needs and is protective of human health. DOH would not and will not approve any source or water system operation unless and until all applicable criteria are met.

Regarding disposal of any post-treatment residuals, per EPA guidance materials addressing treatment options (provided into the record by County staff) EPA has advised that "[b]ased on existing data, EPA does not believe that the drinking water treatment technologies used by small systems will generate hazardous wastes." Regardless the issue of post-treatment disposal is and would be regulated by EPA and DOH, and the YMCA would be required to and committed to meeting all applicable standards to be protective of human health and the environment. Under the County's direction and oversight, this issue will again be more thoroughly reviewed at the BSP stage.

The YMCA is committed to both environmental stewardship and protection of the health and well-being of the youth it serves and of its neighboring communities. Even at this advance planning stage, the YMCA has sought to proactively address issues concerning water rights, availability, and quality. At this non-project rezone stage, there is no indication that arsenic or other water quality issues are implicated by the proposed rezone of the property. Specific issues related to the YMCA's future well siting, water quality issues, treatment and disposal will be thoroughly evaluated at the project stage, including additional SEPA and County review, to ensure any actual proposed use associated with the project meets all applicable criteria and is protective of human health and the environment. The YMCA is committed to working with the County and DOH on these important issues.

### **Emergency Services**

A similar area of concern has been emergency services – which also relates to identifying road requirements for access to and movement around the property. Again, both of these are project-level impacts that will have to be addressed in the binding site plan and resolved to the county's satisfaction before we can move forward. We have a long history of working productively with these rural fire districts, and we are confident that a similarly positive relationship can be established at Mineral Lake.

To that end, we have already funded specialized consultants, the Modern Volunteer Fire Service, to engage with Lewis County Fire District #9 and begin the process of planning for cooperation and support regarding emergency services. The Y funded the effort, but did not direct the consultant's work, which was performed directly with District #9. This work will serve as the foundation for further work to identify mutually agreed-upon fire safety and emergency response strategies as part of the site-specific development agreement. Additionally, the Y staff includes experienced grant application writers and we can offer their expertise to help the District compete for additional funding from state or federal sources.

## Conclusion

In conclusion, I want to again thank the Board for reconsidering this application, and to thank the members of the staff and the Planning Commission for their many hours of hard work in reaching the recommendation that our application for a zoning adjustment be approved. Extensive materials have already been entered into the record in support of this application, and we understand that even more work will need to be done on site-level impacts before we have approval to move forward with construction. But the first step remains approval of the zoning application before you today.

We remain committed to working with the county and the community in the months and years ahead. Thank you.

Sincerely,  
*Gwen Bagley*

Gwen Ichinose Bagley  
Senior Vice President and Youth Development Officer  
YMCA of Greater Seattle

### Enclosures:

Center for Economic and Business Research, Washington State Outdoor School Study (Sept. 2021)

YMCA of Greater Seattle, Sample Outdoor Education Curriculum and Activities

Department of Ecology, Final Report of Examination G2-30759 (Nov. 8, 2021)

Department of Ecology, Water Right Permit No. G2-30759 (Jan. 11, 2022)

U.S. Environmental Protection Agency, Treatment Technologies for Arsenic Removal (Nov. 2005)

Department of Health, Guidance Document: Arsenic Treatment for Small Water Systems, DOH PUB # 331-210, (Nov. 2005)