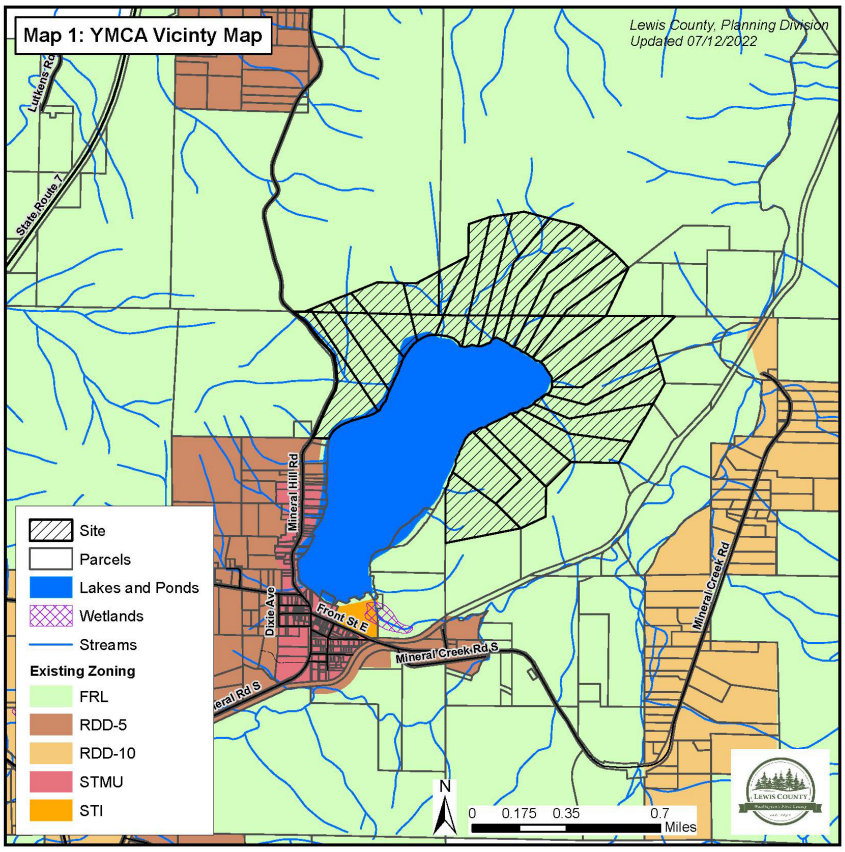
A. SUMMARY

The YMCA Greater Seattle has requested to establish a Master Planned Resort (MPR) overlay zone designation on approximately 500 acres (Map 1). The intended use of the land if rezoned to MPR is to establish a youth and family over-night camping facility for 400 campers and 100 staff on the northern and eastern sides of Mineral Lake. Cabins, tents sites, trails and a dock are proposed. The applicant proposes that site development will occur in three construction phases over a 10 to 15 year period.

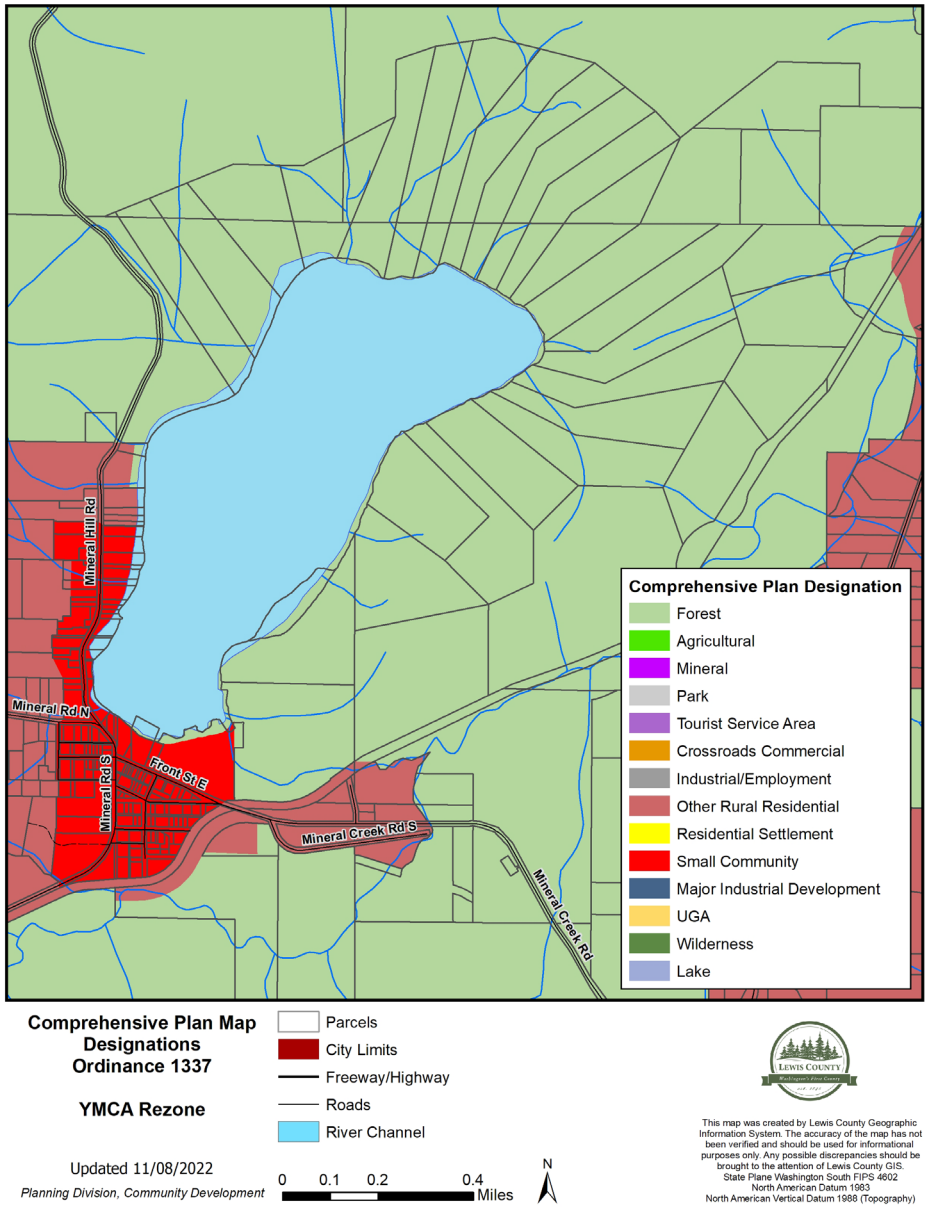
As a condition of the SEPA determination, the YMCA must enter into a Development Agreement with Lewis County to limit the types of development and uses that could occur at the site and a clause that should the YMCA not develop a youth camp the MPR overlay will be removed and the site will revert to FRL. The Development Agreement is a separate document that will be an exhibit to the adopting ordinance.



B. PLANNING COMMISSION RECOMMENDATION

The Planning Commission held a duly noticed public hearing on July 12, 2022 to receive testimony from the public. After closing the record, the Planning Commission voted unanimously that the Board of County Commissioners should pass an ordinance to apply a Master Plan Resort overlay zone to the following parcels: 038931011001, 038931011002, 038931011003, 038931011004, 038931011005, 038931011035, 038931011006, 038931011036, 038931011007, 038931011037, 038931011008, 038931011038, 038931011009, 038931011039, 038931011010, 038931011011, 038931011012, 038931011013, 038931011040, 038931011041, 038931011042, 038931011043, 038931011015,

038931011016, 038931011017, 038931011018, 038931011019, 038931011020, 038931011021, 038931011022, 038931011023 and 038931011024 in Lewis County, WA – Sections 03 & 04, Township 14N, Range 05E & Sections 33 & 34 of Township 15N, Range 05E, WM. Map 2 shows the Lewis County Comprehensive Plan map designation for the parcels listed above. Please note, the designation is not changing; a Master Planned Resort overlay zone is being applied to the parcels.



Map 2: Lewis County Comprehensive Plan Map Designations

The commissioners discussed specific points that they request BOCC consider when making a final decision on the proposed action:

1. <u>Highest and Best Use</u> – The definition is "the reasonably probable and legal use of vacant land or an improved property that is physically possible, appropriately supported, and financially

feasible and that results in the highest value." The Planning Commission believes a youth camp as proposed by YMCA is the highest and best use for the site.

2. Future Impacts – While the rezone approval criteria only considers generalized impacts because no development is proposed at the time of the rezone, future development is likely to have impacts to infrastructure including roads, service providers including the fire district, and potentially the environment. The Planning Commission stresses that during future permitting the County needs to critically evaluate impacts and condition permit approval with appropriate mitigation actions to avoid, reduce or eliminate negative impacts.

3. Tax Burden – The YMCA has stated that they are not using their tax-exempt status on the property and are paying property taxes. The Planning Commission considered this when recommending approval. It is critically important that the cost of improvements to infrastructure or upgrades to services be proportionally paid for by YMCA and Lewis County. The community of Mineral should not bear the burden of increased taxes or fees due to the YMCA's development.

C. STAFF ANALYSIS

The approval criteria that Planning Commission and BOCC are required to use to determine if a Comprehensive Plan map amendment can be approve are listed below. After each criterion, staff have provided a finding to help the Board of County Commissioners assess if the criterion is met.

(a) The amendment conforms to the requirements of the Growth Management Act, is consistent with the county-wide planning policies and the comprehensive plan, including any interlocal planning agreements, if applicable.

Based the findings in Section F, the proposed amendment conforms to the requirements of the Growth Management Act and is consistent with county-wide planning policies and the Lewis County Comprehensive Plan. There are no interlocal planning agreements related to the property or the proposed amendments.

(b) The application and any studies submitted to the department, the planning commission, and the board of commissioners demonstrates a need for the amendment.

The economy of Mineral Lake and the surrounding areas is based largely on tourism. Under the FRL zoning district, harvesting of timber along the north side of Mineral Lake is allowed. Harvesting of timber could have a negative impact on recreation and tourism by removing the trees, displacing wildlife and impairing aesthetics of the area. MPRs are intended to enhance and diversify the recreational and economic opportunities in the rural areas of the county. Uses allowed in a MPR overlay zone will complement the natural and cultural attractiveness of the area without having significant adverse impacts on environmental and natural features, cultural or historic resources and their settings, or existing development.

There is currently no MPR land designated in Lewis County to support enhance recreational activities and the tourism economy. Designating this area as MPR would meet the intent laid out by the County in creating this use option.

YMCA stated that they have seen an increase in demand for over-night camps throughout Washington State. YMCA conducted a five-year study of 30 different sites across Washington State based on a list of target criteria for youth and family camps. According to the YMCA, the Mineral Lake site in Lewis County exceeded the alternatives for its natural views, road access, proximity to an established community, and access to Mt. Rainier.

(c) The public interest will be served by approving the amendment. In determining whether the public interest will be served, factors including but not limited to the following shall be considered:

(i) The anticipated effect upon the rate or distribution of population growth, employment growth, development, and conversion of land as envisioned in the comprehensive plan; and

Project-level impacts of a youth camp will have no permanent impact on population growth because all use will be transient. YMCA intends to employ roughly 100 staff at the site, much of which will be seasonal, which is a significant increase to employment within the rural area. Conversion of land is minimal because MPR standards of LCC 17.20E require a minimum of 40-percent of the total site to be dedicated to a mixture of permanent open space, natural areas, and/or active recreational areas (LCC 17.20E.040(6)). This is not true of FRL and harvesting of timber.

(ii) The anticipated effect on the ability of the county and/or other service providers, such as cities, schools, water purveyors, fire districts, and others as applicable, to provide adequate services and public facilities including transportation facilities.

The zone change is a non-project action which will have no impact on service providers because there is no development associated with a change to zoning. However, future development of a youth camp will likely have an impact on service providers. At the time of MPR application and Binding Site Plan application, and subsequent permitting, when the project-level impacts are known, YMCA is required to address impacts to drinking water, waste water, transportation, fire/emergency and solid waste services as required by state and local laws. There are no anticipated impacts to schools because there will be no permanent housing associated with the development.

There could be an impact on taxes that are used to provide services. At the time of the proposal, YMCA owned the parcels but was not using their tax-exempt status; therefore, YMCA was paying full taxes on the property. In the future, YMCA could use their tax-exempt status and not pay full taxes on the site. This means the tax burden could shift from YMCA to other property owners in order to make up the difference needed to provide necessary services. Adding tax burden to the public could be a negative impact of the zoning designation amendment.

(iii) The anticipated impact upon designated agricultural, forest and mineral resource lands.

The MRP designation is an overlay zone that maintains the underlying FRL zoning. In Lewis County, over 72% of existing land is designated FRL. The proposed project would apply MPR overlay zone to one half of one one-hundredth of total FRL land (0.0005). Therefore, there is negligible impact on resources lands.

(d) The amendment does not include or facilitate spot zoning.

The amendment does not include or facilitate spot zoning because over 30 parcels are included in the map amendment. A new zoning district would be created.

D. SEPA DETERMINATION

Lewis County issued a SEPA Mitigated Determination of Nonsignficance (MDNS) for the proposal. The conditions of the MDNS are stated below. If the rezone is approved, these must be included in the adopting ordinance as conditions of approval.

<u>Conditions of Approval:</u>

1. Within the Master Planned Resort (MPR) overlay zone on parcels 038931011006, 038931011036, 038931011005, 038931011035, 038931011004, 038931011003, 38931011002, 038931011001, 038931011013, 038931011043, 038931011015, 038931011016, 038931011017, 038931011018, 038931011019, and 038931011020 (Lots 1-6, Lot 13 and Lots 15-20 of Record Survey recorded under Auditor File Number 3379875) permitted uses specified in LCC 17.20E.030(1) through LCC 17.20E.030(9) shall be limited to:
   a. Lodges, rental cabins, and appropriate support facilities for visitor-oriented accommodations, including caretaker accommodations;
   b. Recreational sport facilities and undeveloped recreational areas;
   c. Boat docks and marinas compatible with the Lewis County shoreline master program;
   d. Open space areas such as lakes, wetlands, greenbelts, buffers, and wildlife preserves;
   e. Facilities necessary for public safety such as fire and security stations, waste disposal, and utilities within the master planned resort or the county;
   f. Transportation related facilities, emergency medical facilities, and storage structures and areas, provided these uses are ancillary to the master planned resort; and
   g. Cultural community and entertainment facilities such as theaters, amphitheaters, galleries, arts and craft centers, and interpretive centers.

2. Within the Master Planned Resort (MPR) overlay zone on parcels 038931011006, 038931011036, 038931011005, 038931011035, 038931011004, 038931011003, 38931011002, 038931011001, 038931011013, 038931011043, 038931011015, 038931011016, 038931011017, 038931011018, 038931011019, and 038931011020 (Lots 1-6, Lot 13 and Lots 15-20 of Record Survey recorded under Auditor File Number 3379875) permitted uses specified in LCC 17.20E.030(1) through LCC

17.20E.030(9) all other uses permitted by LCC 17.20E.030(1) through LCC 17.20E.030(9) are prohibited including but not limited to:

a. Hotels, motels, bed and breakfast facilities, rental homes, rental condominiums, rental townhouses, time-share units, similar transient lodging facilities and conference and convention facilities;
b. Residential single-family dwellings, townhouses, residential multifamily dwellings, condominiums, and other residential dwellings;
c. Golf courses, clubhouses, pro shops and spa facilities; and
d. Commercial restaurants, specialty shops, barber shops, beauty salons, real estate and other professional offices, grocery stores and pet boarding and care facilities.

3. Within the MPR overlay zone on parcels 038931011007, 038931011037, 038931011012, 038931011042, 038931011011, 038931011041, 038931011010, 038931011040, 038931011009, 038931011039, 038931011008, 038931011038, 038931011021, 038931011022, 038931011023 and 038931011024 (Lots 7-12 and Lots 21-24 of Record Survey recorded under Auditor File Number 3379875) permitted uses specified in LCC 17.20E.030(1) through LCC 17.20E.030(9) shall be limited to the uses listed below as (a) through (e) of this condition. All other uses permitted by LCC 17.20E.030(1) through LCC 17.20E.030(9) are prohibited.
   a. Recreational sport facilities and undeveloped recreational areas;
   b. Boat docks and marinas compatible with the Lewis County shoreline master program;
   c. Open space areas such as lakes, wetlands, greenbelts, buffers, and wildlife preserves;
   d. Facilities necessary for public safety such as fire and security stations, waste disposal, and utilities within the master planned resort or the county; and
   e. Transportation related facilities, emergency medical facilities, and storage structures and areas, provided these uses are ancillary to the master planned resort.

4. If the Master Plan Resort development is not approved through Master Plan Resort application and Binding Site Plan application within five (5) years of execution of a Development Agreement, the MPR overlay zone will expire and the zoning will revert to forest resource land of long-term significance (Forest) for all listed parcels. After the Binding Site Plan is approved, if the subsequent site development permit(s) schedules as described in the Binding Site Plan decision document are not met, or if the subsequent site development permits are not obtained within fifteen (15) years of execution of the Development Agreement, the MPR overlay zone will expire and the zoning will revert to Forest for all listed parcels. If either of the reverters in this paragraph occur, no uses will be permitted to start, persist, or exist in the affected zones unless consistent with Forest zoning (or its successor if renamed or amended in the future), as such zoning exists in the Lewis County Code at the time of reverter or when such use begins, whichever is later. If any use began and was consistent with the MPR overlay zone while it was in effect, but is inconsistent with the zoning change described in the preceding sentence, such use shall cease within six months. Nothing in this provision shall limit the Board of County Commissioners' authority to extend schedules or amend the Lewis County Comprehensive Plan designation or zoning for the listed parcels.

5. Amendments to the schedules as described in Condition 4 are allowed; however, amendments to the use restrictions described in Condition 1, 2 and 3 are prohibited.

E. SUPPORTING MATERIALS

The following supporting documents are available on the Community Development website: https://lewiscountywa.gov/departments/community-development/rezones/

2022-11-04 BOCC Public Testimony
2022-10-31 BOCC Public Testimony
2022-07-12 Planning Commission Meeting Notes
2022-07-12 Planning Commission Public Testimony
2022-03-08 SEP22-0033 SEPA Determination Public Comments
2021-10-05 YMCA Response to Public Comments on Notice of Application
2021-08-31 Local and State Agency Comments on Notice of Application
2021-08-31 Public Comments on Notice of Application
2021-07-12 YMCA Submittal Response to Second Incomplete Letter
2021-04-05 Mineral Lake Civil Due Diligence Response
2021-04-05 YMCA Mineral Lake Pumping Test Methods and Results
2021-04-05 YMCA Mineral Lake Trip Generation Memo
2021-04-05 YMCA Geo Response Letter
2021-04-05 YMCA Mineral Lake Critical Areas Letter
2021-04-05 YMCA Mineral Lake Geotechnical Report
2021-04-05 YMCA Mineral Lake Phase I ESA
2015-12-22 Kidder Creek Traffic Impact Study

F. FINDINGS OF FACT

I. Growth Management Act

RCW 36.70A.350 New fully contained communities.
A county required or choosing to plan under RCW 36.70A.040 may establish a process as part of its urban growth areas, that are designated under RCW 36.70A.110, for reviewing proposals to authorize new fully contained communities located outside of the initially designated urban growth areas.
(1) A new fully contained community may be approved in a county planning under this chapter if criteria including but not limited to the following are met:
(a) New infrastructure is provided for and impact fees are established consistent with the requirements of RCW 82.02.050;

All applicable local and state requirements related to public facilities and services must be met. In addition, the SEPA determination set out terms including – Commensurate with a MPR application and a Binding Site Plan application, project-level impacts to transportation facilities must be addressed including transportation improvements to meet fire and life safety access including, but not limited to, upgraded road approaches and the addition of secondary access, as required by Lewis County Fire

District 9 and the Department of Natural Resources. Commensurate with a MPR application and a Binding Site Plan application, Lewis County Code 17.130, Adequate Public Facilities and Services, must be met which includes addressing water, waste water, fire/emergency service, schools, transit and solid waste. Therefore, this criterion is met.

(b) Transit-oriented site planning and traffic demand management programs are implemented;

The proposed amendment will establish a MPR zone designation that is not located near transit because the location is intended to take advantage of the rural area's environmental and natural amenities for recreational purposes. Future use of the site will be for short-term visitor accommodations for overnight camping in cabins and tents. Traffic demand management, which is intended for use in urban areas where routine congestion is experienced, is not intended for use in a rural setting with transient uses. Therefore, this criterion is not applicable.

(c) Buffers are provided between the new fully contained communities and adjacent urban development;

The site is not located near urban development. The site is located near a local area of more intense rural development (LAMIRD). Therefore, this criterion is not applicable.

(d) A mix of uses is provided to offer jobs, housing, and services to the residents of the new community;

The proposed MPR includes no residential uses and is only intended for short-term visitor accommodations including caretaker accommodations. Therefore, this criterion is not applicable. However, the future use of the MPR site is expected to provide approximately 100 new jobs for local residents.

(e) Affordable housing is provided within the new community for a broad range of income levels;

The proposed MPR is intended for short-term visitor accommodations for an overnight youth camp, no residential uses are included. Therefore, this criterion is not applicable.

(f) Environmental protection has been addressed and provided for;

The proposed amendment is a non-project action and potential development impacts are unknown at this time. The SEPA determination set conditions of approval including - Commensurate with a MPR application and a Binding Site Plan application, project-level impacts to shoreline environments, stream buffers, wetlands, floodplain, wildlife habitat, steep slopes, erosion hazard and arsenic testing must be addressed. This would occur through a project SEPA review, as well as review under LCC 17.25, Shoreline Management, and 17.38, Critical Areas. In addition, the proposed amendment is a MPR zone

which provides protection for open space and wildlife habitat areas because LCC 17.20E requires that 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. Therefore, this criterion is met.

(g) Development regulations are established to ensure urban growth will not occur in adjacent nonurban areas;

The lands surrounding the site will remain in the existing zoning designations which are Forest Resource Land (FRL) and Rural Development District 5 (RDD-5), which are both nonurban zones. Therefore, this criterion is met.

(h) Provision is made to mitigate impacts on designated agricultural lands, forestlands, and mineral resource lands;

The proposal is an application of a MPR overlay zone designation to Forest Resource Land. The change will remove less than one half of one one-hundredth percent of the land used for forestry in Lewis County of total FRL (0.0005%) to a MPR, which is a negligible impact. Therefore, this criterion is met.

(i) The plan for the new fully contained community is consistent with the development regulations established for the protection of critical areas by the county pursuant to RCW 36.70A.170.

Please refer to response to 36.70A.350(1)(f). This criterion is met.

(2) New fully contained communities may be approved outside established urban growth areas only if a county reserves a portion of the twenty-year population projection and offsets the urban growth area accordingly for allocation to new fully contained communities that meet the requirements of this chapter. Any county electing to establish a new community reserve shall do so no more often than once every five years as a part of the designation or review of urban growth areas required by this chapter. The new community reserve shall be allocated on a project-by-project basis, only after specific project approval procedures have been adopted pursuant to this chapter as a development regulation. When a new community reserve is established, urban growth areas designated pursuant to this chapter shall accommodate the unreserved portion of the twenty-year population projection.

The proposed amendment does not include new residential uses and is intended only for short-term visitor accommodations. None of the 20-year population projection will be accommodated in the new fully contained community. Therefore, this criterion is not applicable.

RCW 36.70A.360 Master planned resorts.

(1) Counties that are required or choose to plan under RCW 36.70A.040 may permit Master Planned Resorts which may constitute urban growth outside of urban growth areas as limited by this section. A Master Planned Resort means a self-contained and fully integrated planned unit

development, in a setting of significant natural amenities, with primary focus on destination resort facilities consisting of short-term visitor accommodations associated with a range of developed on-site indoor or outdoor recreational facilities.

The proposed MPR is intended for an overnight youth camp that accommodates roughly 400 campers and 100 staff in cabins and tents. Also proposed are indoor and outdoor recreational facilities including trails and a dock. The location is north of Mineral Lake which is a setting of significant natural amenities. Therefore, this criterion is met.

(2) 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.

Nothing in this subsection may be construed as: Establishing an order of priority for processing applications for water right permits, for granting such permits, or for issuing certificates of water right; altering or authorizing in any manner the alteration of the place of use for a water right; or affecting or impairing in any manner whatsoever an existing water right.

All waters or the use of waters shall be regulated and controlled as provided in chapters 90.03 and 90.44 RCW and not otherwise.

Commensurate with a MPR application and a Binding Site Plan application, project-level impacts to transportation facilities must be addressed including transportation improvements to meet fire and life safety access including, but not limited to, upgraded road approaches and the addition of secondary access, as required by Lewis County Fire District 9 and the Department of Natural Resources. Commensurate with a MPR application and a Binding Site Plan application, Lewis County Code 17.130, Adequate Public Facilities and Services, must be met which includes addressing water, waste water, fire/emergency service, schools, transit and solid waste. Lewis County Code meets 90.03 and 90.44 RWC. Therefore, this criterion is met.

(3) A Master Planned Resort may include other residential uses within its boundaries, but only if the residential uses are integrated into and support the on-site recreational nature of the resort.

No residential uses are associated with the proposed MPR. Caretaker accommodations, which are accessory to the primary use of the MPR for short-term visitor accommodations is allowed. Therefore, this criterion is met.

(4) A Master Planned Resort may be authorized by a county only if:
(a) The comprehensive plan specifically identifies policies to guide the development of Master Planned Resorts;

The adopted Lewis County Countywide Planning Policies include the following:
1.0 Urban growth shall be encouraged within cities and their designated urban growth boundaries or other areas in the County characterized by urban growth and areas approved as industrial master planned areas, master planned resorts, and as new fully contained communities pursuant to RCW 36.70A.350.
1.8 Rural areas will only be approved for designation as master planned development locations, appropriate for urban growth outside incorporated urban growth areas, when consistent with RCW 36.70A.350, .360, .362, .365, .367 and .368.
Therefore, this criterion is met.

(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;

The Comprehensive Plan map and official zoning map applied existing zoning designation to the land in the vicinity of the MPR as Forest Resource Land, Rural Development District and LAMIRD, all of which allow rural development and preclude new urban development, unless otherwise allowed per LAMIRD rules pursuant to applicable state laws. Therefore, this criterion is met.

(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;

The site is uniquely located along the northern side of Mineral Lake and within 15 miles of Mt. Rainier National Park. No other site in Lewis County offers both recreational opportunities within the similar proximity. 72% of Lewis County is designated forest resource. The change will remove less than one half of one one-hundredth percent of the land used for forestry in Lewis County of total FRL (0.0005%) to a MPR, which is a negligible impact. Therefore, this criterion is met.

(d) The county ensures that the resort plan is consistent with the development regulations established for critical areas; and

Commensurate with a MPR application and a Binding Site Plan application, project-level impacts to shoreline environments, stream buffers, wetlands, floodplain, wildlife habitat, steep slopes, erosion hazard and arsenic testing must be addressed. This would occur through a project SEPA review, as well as review under LCC 17.25, Shoreline Management, and 17.38, Critical Areas. Therefore, this criterion is met.

(e) On-site and off-site infrastructure and service impacts are fully considered and mitigated.

Commensurate with a MPR application and a Binding Site Plan application, project-level impacts to transportation facilities must be addressed including transportation improvements to meet fire and life safety access including, but not limited to, upgraded road approaches and the addition of secondary access, as required by Lewis County Fire District 9 and the Department of Natural Resources. Commensurate with a MPR application and a Binding Site Plan application, Lewis County Code 17.130, Adequate Public Facilities and Services, must be met which includes addressing water, waste water, fire/emergency service, schools, transit and solid waste. Therefore, this criterion is met.

RCW 36.70A.362 Master planned resorts—Existing resort may be included.

The proposed amendment is for a new MPR, therefore this RCW is not applicable.

RCW 36.70A.365 Major industrial developments.

The proposed amendment is not a Major Industrial Development, therefore this RCW is not applicable.

RCW 36.70A.367 Major industrial developments—Master planned locations.

The proposed amendment is not a Major Industrial Development, therefore this RCW is not applicable.

RCW 36.70A.368 Major industrial developments—Master planned locations—Reclaimed surface coal mine sites.

The proposed amendment is not a Major Industrial Development, therefore this RCW is not applicable.

II. Lewis County Countywide Planning Policies

1 Urban Growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

Policies 1.1, 1.3 through 1.6, 1.9, 1.11 do not apply because they are specific to cities and associated Urban Growth Areas (UGAs) that abut Interstate 5. The proposed amendment applies to land outside of city limits/UGAs and is not abutting Interstate 5. The proposed amendment does not include any

amendments to the countywide planning policies or existing UGAs and therefore 1.12 is not applicable.

Mater Planned Resorts (MPR) are designated areas of urban growth outside of Urban Growth Areas as limited by RCW 36.70A.360 (please refer to Growth Management Act findings.) The terms of the non-project SEPA determination are consistent with this planning policy because development is limited to uses and densities consistent with rural development including cabin and tent sites, trails, entertainment or cultural facilities, and public facilities and services that will serve the MRP.

1.0 Urban growth shall be encouraged within cities and their designated urban growth boundaries or other areas in the County characterized by urban growth and areas approved as industrial master planned areas, MRPs, and as new fully contained communities pursuant to RCW 36.70A.350.

Please refer to the Growth Management Act findings.

1.2 Land use planning for the urban growth areas should provide for urban densities of mixed uses (except for industrial master planned areas) where logical and existing and/or planned urban services are available. Affordable housing policies and urban density policies should have equal value in evaluating and/or planning new or expanded housing areas.

The proposed amendment would create a MPR overlay zone designation. Urban services (e.g., municipal water and sewer) are not planned for the youth camp, which will be served by wells and septic systems. No residential housing is included in the proposal, only short-term visitor accommodations such as cabins. Therefore, this planning policy is not applicable.

1.7 Rural areas have low-density development, which can be sustained by minimal infrastructure improvements. Exceptions will be made for areas appropriate for more intense development that are consistent with state law.

MRPs are an exception for more intense development consistent with state law. Therefore, the proposed amendment is consistent with this planning policy.

1.8 Rural areas will only be approved for designation as master planned development locations, appropriate for urban growth outside incorporated urban growth areas, when consistent with RCW 36.70A.350, .360, .362, .365, .367 and .368.

Please refer to Growth Management Act findings.

1.9 The County and cities shall inform the appropriate jurisdictions concerning proposed development or activities that would impact urban resources and/or urban growth areas.

The proposed amendment does not impact urban resources and/or Urban Growth Areas. All service providers were informed of the proposed amendment through the SEPA review process. Therefore, the proposed amendment is consistent with this planning policy.

1.10 The County and Cities shall collaborate to provide a mechanism for siting and maintaining both existing and new essential public facilities including:
   a. Sewage treatment and municipal water facilities
   b. Solid Waste Facilities
   c. Port District/PDA industrial facilities
   d. Airport locations
   e. Other essential public facilities as identified under GMA

The proposed amendment does not include new public facilities. No existing public facilities are located within the site. Therefore, this planning policy is not applicable.

2 Reduce Sprawl. Reduce the inappropriate conversion of undeveloped or rural land into sprawling, low- density development.

The proposed amendment does not require urban services. The future MPR development will be served by wells and septic systems, and will meet applicable state health laws. Transportation will be provided by County roads and private roads and will meet road requirements. The proposed amendment is not within an UGA. The proposed amendment includes terms that require development uses and densities be consistent with rural areas. Therefore, the proposed amendment is consistent with planning policies 2.0 through 2.4.

2.5 Developments authorized under RCW 36.70A.350, .360, .362, .365, .367 and .368 may be served by urban sewer and water systems consistent with state law. However, no additional connections may be allowed at urban levels of service in rural areas or resource lands that are outside of these areas or adopted UGAs.

There is no proposed urban sewer or water systems with the non-project action amendment. If future development requires urban sewer or water systems, findings against RCW 36.70A.350, .360, .362, .367 and .368 will be made. A MRP is allowed to include urban levels of serves per state law. Therefore, the proposed amendment is consistent with this planning policy.

3 Transportation. Encourage efficient multi-modal transportation systems that are based on regional priorities and coordinated with County and City comprehensive plans.

The proposed amendment does not change the Transportation Element of the Lewis County Comprehensive Plan. The terms of the non-project SEPA determination require that all LOS are maintained. The proposed amendment is not within a city or city UGA. There are no public expenditures on transportation facilities associated with this proposed amendment. There are no airports or rail facilities within the site. Therefore, the proposed amendment is consistent with planning policies 3.0 through 3.3, 3.5, 3.6, and 3.8 through 3.10.

3.4 State and local governments should ensure adequate road access to scenic and recreational areas,

to accommodate local and tourist traffic.

The proposed amendment increases access to scenic and recreational areas and all LOS will be maintained on all existing roads. Therefore, the proposed amendment is consistent with this planning policy.

3.7 The County and cities should encourage the use of alternative transportation modes, including mass transit, bicycles, and carpooling when developing improvement programs, designing new development and standards.

The proposed amendment includes future trails, which encourages alternative modes of transportation. Therefore, the proposed amendment is consistent with this planning policy.

4 Housing. Encourage the availability of affordable housing to all economic segments of the population, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

There is no housing associated with the proposed amendment. All accommodations will be for transient use, including seasonal employees. Therefore, this planning policy is not applicable.

5 Economic Development. Encourage economic development throughout Lewis County that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens, especially for unemployed and for disadvantaged persons, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of Lewis County's natural resources, public services and public facilities.

The proposed amendment is not within a UGA, does not include agriculture, forestry and mineral extraction, or commercial and industrial uses, or energy production; therefore, planning policies 5.1, 5.3, 5.5, 5.8 and 5.9 are not applicable.

5.0 The development of businesses and industries should be encouraged within cities, urban growth areas, designated Limited Areas of More Intense Rural Development (LAMIRDs), and those unincorporated areas of Lewis County that satisfy the requirements set forth in RCW 36.70A.350, .360, .362, .365, .367, and 368.

A Master Planned Resource is consistent with RCW 36.70A.350, .360, .362, .365, .367, and 368. Please refer to Growth Management Act findings.

5.2 A diversified economic base should be encouraged to minimize the vulnerability of the local economy to economic fluctuations.

The proposed MRP will be the first in Lewis County and will diversify the economic base. Therefore, the proposed amendment is consistent with this planning policy.

5.4 Tourism and recreation should be promoted as a strategy that protects the character of rural and urban areas, and supports economic development.

The proposed MRP will promote tourism and recreation by bring roughly 400 campers and 100 staff to the future youth camp. This supports economic development. Lewis County Code 17.20E requires that at least 40 percent of the total site area shall be dedicated to a mixture of permanent open space, natural areas, and/or active recreational areas, excluding streets and parking areas which protects rural character. Therefore, the proposed amendment is consistent with this planning policy.

5.6 Value added industries shall be encouraged.

A MRP is a type of eco-tourism that adds value to the tourism industries in Lewis County; therefore the proposed amendment is consistent with this planning policy.

5.7 Recreational or tourist activities directly related to or dependent upon water bodies should be encouraged. Tourism and recreation should be promoted as a strategy that protects the character of rural and urban areas.

The proposed MRP is located on the north side of Mineral Lake. Trails and a boat dock are proposed that are directly related to the water body. Lewis County Code 17.20E requires that at least 40 percent of the total site area shall be dedicated to a mixture of permanent open space, natural areas, and/or active recreational areas, excluding streets and parking areas which protects rural character. Therefore, the proposed amendment is consistent with this planning policy.

5.10 The County and cities should encourage efforts to expand workforce training and development to provide skilled labor for alternative energy industries and "green collar" jobs.

The future proposed youth camp anticipates employing roughly 100 persons. There will be a wide range of jobs, including those associated with eco-tourism, which is a "green collar" job. Therefore, the proposed amendment is consistent with this planning policy.

5.11 The location, retention, and expansion of businesses that provide family wage jobs should be supported.

The future proposed youth camp anticipates employing roughly 100 persons. This is an overall increase in employment within the rural area of the County. There will be a wide range of jobs with a range of wages provided, likely include some family wage jobs. Therefore, the proposed amendment is consistent with this planning policy.

6 Property Rights. Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.

The proposed amendment is being made by the private property owner and is not for a public use. Therefore, planning policies 6.0 through 6.2 are met.

7 Permit. Applications for local government permits should be processed in a timely and fair manner to ensure predictability.

The proposed amendment is being processed as a Type V permit application with associated non-project action SEPA review. All required legal timelines have been met. Therefore, planning policies 7.0 through 7.3 are met.

8 Natural Resource Industries. Maintain and enhance natural resource-based industries including productive timber, agricultural, mineral extraction and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses.

The site is not adjacent to an Urban Growth Area, therefore planning policy 8.5 is not applicable. The proposed amendment is not relate to alternative energy production or education, therefore this planning policy 8.6 is not applicable.

8.0 Land uses adjacent to agricultural, forest, or mineral resource lands shall not interfere with the continued use of these designated lands for the production of food or agricultural based products, or timber, or for the extraction of minerals. Encroachment on resource lands by incompatible uses shall be prevented by maintenance of adequate buffering between conflicting activities.

The site of the proposed amendment is adjacent to Forest Resource Land. The proposed MPR is fully contained and will not have negative impacts on the continued use of the forest resource. Therefore, the proposed amendment is consistent with this planning policy.

8.1 Approvals for plats, short plats, building permits and other residential development permits that are issued for development activities on or adjacent to designated natural resource areas should include a notice that certain activities may occur that are not compatible with residences. These notices should be filed for record with Lewis County.

The terms of the SEPA determination prohibit residential development, only transient accommodations including caretaker accommodations will be allowed. The MRP application requires a Binding Site Plan and will trigger project-level SEPA review. The Notice of Application and SEPA determination will be sent to adjacent property owners as per legal requirements. Therefore, the proposed amendment is consistent with this planning policy.

8.2 Fishery resources, including the County's river systems inclusive of their tributaries, as well as the area's lakes, and associated wetlands, should be protected and enhanced for continued

productivity.

The proposed amendment is a non-project action and will have no impact on fishery resources. If there are future, project-level impacts identified through subsequent permitting process or SEPA review, those will be required to be avoided, minimized or mitigated per LCC 17.25, Shoreline Management, and 17.38, Critical Areas. Therefore, the proposed amendment is consistent with this planning policy.

8.3 Tourism and recreation, including economic opportunities that provide supplemental income to the natural resources industries, should be encouraged.

The MPR provides additional economic opportunities for the eco-tourism industry by creating approximately 100 new jobs. Therefore, the proposed amendment is consistent with this planning policy.

8.4 All jurisdictions should encourage best management practices (BMP) to reduce adverse environmental impacts on natural resources

The proposed amendment is a non-project action and will have no impact on the environment. If there are future, project-level impacts identified through subsequent permitting process or SEPA review, those will be required to be avoided, minimized or mitigated per LCC 17.25, Shoreline Management, and 17.38, Critical Areas. Therefore, the proposed amendment is consistent with this planning policy.

9 Open Space and Recreation. Encourage the retention of open space and development of recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks.

9.0 The use of Open Space and Forestry Taxation Laws shall be encouraged as a useful method of resource preservation.

The proposed amendment is not related to use of taxation laws to preserve resource land. Therefore, this planning policy is not applicable.

9.1 Parks, recreation, scenic areas and scenic byways, and viewing points should be encouraged.

The proposed amendment to rezone the site MPR will preserve a recreational use and enhance the scenic qualities of the area by removing the option to harvest timber and displace wildlife on the north side of Mineral Lake. MPR standards LCC 17.20E requires that at least 40 percent of the total site area shall be dedicated to a mixture of permanent open space, natural areas, and/or active recreational areas. Therefore, the proposed amendment is consistent with this planning policy.

9.2 The Lewis County river systems and tributaries are a resource that should be protected, enhanced, and utilized for active and passive recreation.

The proposed amendment is a non-project action that will have no impact on river systems. Therefore, this planning policy is not applicable. Future project-level actions will require all local and state laws are met related to protection of surface streams and lakes including LCC 17.25, Shoreline Management, and 17.38, Critical Areas. The proposed amendment is consistent with this planning policy.

9.3 Encourage cluster housing and innovative techniques for planned developments in the County to provide open space systems and recreational opportunities.

The proposed amendment is a Master Planned Resort that will enhance recreational opportunities and protect open space because LCC 17.20E requires that at least 40 percent of the total site area shall be dedicated to a mixture of permanent open space, natural areas, and/or active recreational areas. Therefore, the proposed amendment is consistent with this planning policy.

9.4 Land use planning for the adopted urban growth areas shall encourage greenbelt or open space uses and encourage the protection of wildlife habitat areas.

The proposed amendment is a MPR which protects open space and wildlife habitat areas because LCC 17.20E requires that 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. The FRL standards do not require this level of open space protection. Therefore, the proposed amendment is consistent with this planning policy.

10 Environment. Protect the environment and enhance Lewis County's high quality of life including air and water quality, and the availability of water.

The proposed amendment is not a sub-area plan or creation of a development regulation, it is not related to an interagency agreement and it does not change the County's recognition of river systems; therefore planning policies 10.0, 10.1 and 10.2 are not applicable. The proposed amendment is not a commercial, industrial or residential development, therefore policy 10.4 is not applicable. The proposed amendment does not relate to flood control management programs, therefore policy 10.5 is not applicable. The proposed amendment does not develop policies and regulations related to aquifer recharge, therefore policy 10.7 is not applicable. The proposed amendment is a non-project action that does not relate to recycling, therefore policy 10.8 is not applicable.

10.3 Septic systems, disposal of dredge spoils and land excavation, filling and clearing activities shall conform with critical area development regulations and not have a significant adverse effect on Lewis County water bodies with respect to public health, fisheries, aquifers, water quality, wetlands, and fish and wildlife habitat.

The proposed development is a non-project action that does not include septic systems, disposal of dredge spoils and land excavation, or filling and clearing activities. Future project-level impacts will be required to conform to all applicable local and state requirements including LCC 17.25, Shoreline Management, and 17.38, Critical Area, as well as SEPA review. Therefore, the proposed amendment is

consistent with this planning policy.

10.6 Floodplains, lakes, rivers, streams, and other water resources should be managed for multiple beneficial uses including, but not limited to flood and erosion control, fish and wildlife habitat, agriculture, aquaculture, open space and water supply. Use of water resources should to the fullest extent possible preserve and promote opportunities for other uses.

The proposed amendment is a MPR that will protect open space and fish and wildlife habitat areas because LCC 17.20E requires that at least 40 percent of the total site area shall be dedicated to a mixture of permanent open space, natural areas, and/or active recreational areas. Therefore, the proposed amendment is consistent with this planning policy.

11 Citizen Participation and Coordination. Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.

The proposed amendment has been processed according to LCC 17.05 and 17.12 requirements and meets all applicable state laws. Below is are the steps and the citizen participation and coordination opportunities are highlighted in gray. The process meets planning policies 11.0 through 11.7.

2020-12-30	Application Submitted by YMCA
2021-02-11	Letter of Incompleteness sent to Applicant
2021-04-05	Response to Letter of Incompleteness sent to Lewis County
2021-04-19	Second Letter of Incompleteness sent to Applicant
2021-07-09	Response to Second Letter of Incompleteness sent to Lewis County
2021-07-26	Letter of Completeness sent to Applicant
2021-08-05	Notice of Application posted to: • The Chronicle • Properties within 500 feet of subject properties • On Site • On Lewis County Community Development Website
2021-08-20	Comments on Notice of Application due (all commenters are "parties to the record")
2021-08-27	Comments provided to Applicant
2021-10-05	Application Addendum by Applicant to clarify acreage
2021-11-09	90 day period for Applicant to Amend Application closes, *optional* • No amendment provided
2022-02-22	SEPA Determination Issued and posted to: • The Chronicle • Properties within 500 feet of subject properties • Parties to the Record • SEPA Register • Interagency Review list

	• Tribal Review list • School District • Fire District • On Site • On Lewis County Community Development Website
2022-03-08	Comments on SEPA Determination due (all commenters are "parties to the record")
2022-03-15	SEPA Appeals due • No appeals filed
2022-04-12	Press Release with Planning Commission Schedule; also emailed to Parties to the Record
2022-06-28	Planning Commission Public Hearing

12 Public Facilities and Services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

The proposed amendment is a non-project action. Project-level impacts will be assessed at the time of permitting. All applicable local and state requirements related to public facilities and services must be met. In addition, the SEPA determination set out terms of the determination including – Commensurate with a MPR application and a Binding Site Plan application, project-level impacts to transportation facilities must be addressed including transportation improvements to meet fire and life safety access including, but not limited to, upgraded road approaches and the addition of secondary access, as required by Lewis County Fire District 9 and the Department of Natural Resources. Commensurate with a MPR application and a Binding Site Plan application, Lewis County Code 17.130, Adequate Public Facilities and Services, must be met which includes addressing water, waste water, fire/emergency service, schools, transit and solid waste. Therefore, the proposed amendment is consistent with planning policies 12.0 through 12.4.

The proposed amendment includes no capital facilities financing, no special districts or associated comprehensive plans and is no related to alternative energy generation; therefore planning policies 12.5 through 12.7 are not applicable.

13 Historic Preservation. Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance to Lewis County.

The proposed amendment is a non-project action. Project-level impacts will be assessed at the time of permitting. All applicable local and state requirements related to public facilities and services must be met. In addition, the SEPA determination set out terms including – Prior to any ground disturbing activities YMCA is required to conduct a professional archaeological survey of the project area and engage in consultation with the concerned Tribes' cultural committees and staff regarding cultural

resource issues. Results of the survey and consultation must be provided to Department of Archaeology and Historic Preservation (DAHP) and all DAHP recommendations are required to be met. Therefore, the proposed amendment is consistent with planning policies 13.0 through 13.2.

III. Lewis County Comprehensive Plan

Master Planned Resorts are part of the Land Use Element, Rural Lands, of the Lewis County Comprehensive Plan. The applicable goals and policies are addressed below.

1.2 Consider the Types of Rural Development shown in this section, and similar building forms, as development types that are consistent with the rural character of Lewis County.

The Land Use section states that MPRs are:

- A self-contained and fully integrated resort constructed in a site of significant natural amenities with attached or detached residential, lodging or commercial uses
- Human scale within the resort with trails/walkways to facilitate movement through the area
- Resource/Rural Land (at present). Master Plan (future)

The proposed YMCA youth camp is consistent with policy 1.2 because it will be a self-contained, integrate resort within an area of significant natural amenities with lodging and commercial uses. It will include trails. The present land use is resource land and the future use is master plan. Therefore, the proposed amendment is consistent with this policy.

1.3 Consider the small unincorporated communities, and other Limited Areas of More Intensive Rural Development (LAMIRDs), as key elements of the rural character of Lewis County. Existing LAMIRDs provide the opportunity for rural residents to purchase goods and services, and offer locations for residents to live, start a business or find a job.

The proposed MPR will create a new small community with roughly 400 cabin and tent sites as well as associated recreational facilities, and is a key element of the rural character. Therefore, the proposed amendment is consistent with this policy.

1.4 Continue to zone rural lands for a variety of densities and uses. Consider land capability, existing development characteristics, proximity to rural facilities, and other relevant factors in the zoning of land.

The proposed MRP overlay zone will add to the variety of densities and uses. If approved, the MPR overlay zone will be the first use of the intended zone within Lewis County. The proposed site is capable of supporting this land use, as limited by the SEPA determination. Therefore, the proposed amendment is consistent with this policy.

1.5 Encourage rural clustering, both at smaller scales (such as farm clusters) and larger scales, as a means of balancing growth and the protection of natural resources.

The proposed MPR is a larger scale contained resort, as envisioned by the Lewis County Comprehensive Plan. Subsequent project-level MPR application and Binding Site Plan application review will require compliance with all Lewis County Codes including 17.25, Shoreline, and 17.38, Critical Areas, which will ensure protection of natural resources. Therefore, the proposed amendment is consistent with this policy.

2.1 Promote the development of a vital rural economy in Lewis County with jobs in agriculture, mining, timber production, home occupations, small businesses, and a variety of other industries.

The proposed MPR is anticipated to provide 100 new jobs within the rural area, outside of LAMIRDs. Therefore, the proposed amendment is consistent with this policy.

3.1 Ensure that rural public facilities and services are provided at levels that are consistent with the preservation of rural character and in the historical and typical manner that is found in rural Lewis County. Use development regulations to ensure that water, wastewater treatment and other services are consistent with established standards.

The proposed MRP will include rural services including septic, well and transportation. Through subsequent project-level MPR application and Binding Site Plan application, review will require compliance with all local and state requirements related to septic, well and transportation facilities. Therefore, the proposed amendment is consistent with this policy.

3.2 Coordinate the review of rural development with rural water systems, fire districts, and school districts. This coordination is intended to assure that new uses have adequate facilities in place concurrent with development or are able to develop adequate mitigation agreements when upgrades are necessary to meet current standards. County development regulations will identify the levels of rural services that must be available or provided to meet concurrency requirements.

The Rezone Application has been noticed to the special districts that serve the site. Comments from the special districts were incorporated into the SEPA determination as conditions of the determination. Subsequent MPR application and Binding Site Plan application will require all state and local rules are met, including those related to levels of service. Therefore, the proposed amendment is consistent with this policy.

10.0 Permit master planned resorts, or self-contained and fully integrated planned unit developments in settings of significant natural amenities, within Lewis County.

10.1 Verify that all proposed master planned resorts meet the requirements in 36.70A.360.

Please refer to the Growth Management Act findings.

10.2 Require master planned resorts to be at least 40 acres in size.

The proposed MPR site is 500 acres in size. This policy is met.

10.3 Preclude new urban or suburban land uses in the vicinity of the master planned resorts, except in those areas otherwise designated for urban development.

The comprehensive plan map and official zoning map applied existing zoning designation to the land in the vicinity of the MPR as Forest Resource Land, Rural Development District and LAMIRD, all of which allow rural development and preclude new urban development, unless otherwise allowed per LAMIRD rules pursuant to applicable state laws. Therefore, the proposed amendment is consistent with this policy.

10.4 Consider the requirement for significant natural amenities as a requirement that applies to amenities that exist on or off the individual project site. Significant natural amenities may include a variety of natural lands, including but not limited to mountains, lakes or rivers, or views of, or access to, those natural features.

The proposed MRP site is located on the north side of Mineral Lake and in close proximity to Mt. Rainier National Park, both of which are significant natural amenities. The MPR zone designation and subsequent recreational uses will increase access to mountains and lakes. Therefore, the proposed amendment is consistent with this policy.

10.5 Require an open space system/trail network as part of all proposed master planned resorts.

LCC 17.20E requires that at least 40 percent of the total MRP site area be dedicated to a mixture of permanent open space, natural areas, and/or active recreational areas. The proposed MPR will include a system of trails. Therefore, the proposed amendment is consistent with this policy.

10.6 Permit residential and commercial uses within master planned resorts, so long as the primary use of the property is for short-term visitor accommodation.

The MRP allowed uses of 17.20E include lodges, rental cabins and support facilities, including caretaker accommodations; recreation sport facilities and recreational areas; entertainment facilities (e.g., amphitheaters); boat docks and marinas; open spaces; public facilities and services (e.g., waste disposal, utilities); and transportation facilities. Therefore, the proposed amendment is consistent with this policy.

10.7 Do not require proposed master planned resorts to establish an urban growth area boundary or be allocated a population projection.

Although MPRs are treated as an Urban Growth Area per the RCWs and must comply with specific sections of the Growth Management Act, an official Urban Growth Area boundary is not applied to the site. The MPR overlay zone is used instead of the Urban Growth Area boundary, but held to the same standards. There is no population allocated to lands with the MPR overlay zone designation. Therefore, the proposed amendment is consistent with this policy.