



**Prepared Statement
For Public Comment Record
2/28/22 – City of Cle Elum Council Meeting**

Sun Communities has self-defined the 47 Degree North Project as a Major Modification to the approved Bullfrog Flats Master Site Plan and Development Agreement.

They are a \$1.2 billion corporation, with a building model predicated on them retaining ownership of the land ongoing - making them by far the single largest landowner in Cle Elum's future. That was never the intention of the 2002 Annexation and Development Agreement.

In deciding to purchase, and own 100% of the property subject to the original Development Agreement, they must start with the plan as it was approved decades ago. Their rights, responsibilities and obligations are inherited.

Instead, Sun Communities has strategically started at the highest point of indifference to that obligation, by assuming the City of Cle Elum would support their business plan for the land – and all the major modifications that embodies. This is strategically intentional – so as they work backwards from their request, every inch they acquiesce is viewed as an accommodation on their part.

In a Sun Communities Board Room somewhere, Cle Elum likely has a big green pin stuck through it on a map. We were identified opportunistically as a community with strong trending growth, but likely too limited on resources to successfully defend ourselves.

When Sun Communities came before this City Council on Jan 24th it was a “let's start fresh” approach. But at this meeting they articulated being in the middle stages of their planning process, reconveying that their overall goals are unchanged. This does not convey a “spirit of collaboration, transparency and trust” ... words they used to imply a genuine partnership was desired. But their actions say otherwise.

They lead with promises of a second grocery store while simultaneously proposing downsizing the Business Park to 1/3 of its original size, acreage that included enough space for a highly diverse offering of retail and service businesses. One that could support a population twice the current size. Sun Communities instead suggests we will be fine with an even greater scarcity of commercial storefronts than we struggle with today. The loss in sales tax revenue is also real and detrimental.

Manufactured homes as a viable housing option, are not being debated. It's putting them on rented land, with fixed costs that increase annually, that is. This lack of land ownership, along with commonly less advantageous financing terms and stunted appreciation, contribute to what is referred to by city planners as “housing insecurity.”

Though significantly more profitable for their shareholders, this perpetual land rental model has consistently shown to be destabilizing to small communities like ours in Upper County. Even at a fraction of the scale of units that Sun Communities has proposed, it is consistently recommended for placement only in much larger cities where the impacts are able to be better absorbed. And annual property tax revenue for Cle Elum would be less. There is no way to disguise that.

Sun Communities has decided that they can interpret the Cle Elum Comprehensive Plan to accommodate their proposal, by drawing on the language of creating affordable housing for all income

levels. Yet their price points, on the vast majority of their manufactured homes, are not affordable for the initial tiers of low-income buyers. There are many award-winning examples of true affordable housing project designs. But they require the land to accompany the home purchased to allow for appreciation of personal equity and robust community loyalty.

Sun Communities intentionally quotes the “further development of destination tourism” as central to our city’s economic development plan. And I agree. Destination Tourism has been our calling card for decades. But those words cannot be twisted by them to mean an RV Park of hundreds of transient “quasi-residents” in personal RV’s that are here for months on end.

Destination Tourism and Economic Development in Upper Kittitas County is about heathy campsites, adequate lodging accommodations, restaurants, retail shops and substantial trailheads that accommodate short term visitors, here for long weekends or even several weeks. They enjoy recreating on our lands, spending money in our businesses and then return home after a memorable experience.

Which brings me to my real fear.

Our Kittitas County Sheriff has clearly articulated his concerns in his letter provided to the Kittitas County Commissioners on 8/12/21. Describing in detail the negative and potentially dangerous outcomes that could result from such a significant shift to a population tied to non-landed residences and recreational vehicles. RV Parks and Land-Lease housing projects have proven to be highly destabilizing to small communities on a scale **a fraction** of what is being proposed for our community.

It has been proven time and again, that these types of developments attract opportunists and even predators. These individuals seek to live off the good will (and resources) of others, even though they have assets of their own. They intentionally look for these types of parks in small communities, as a place to “live” and hide their undesirable behaviors in plain sight ... often going undetected. They can pose a significant risk to not only our current citizens, but to their “park neighbors” who have only good and honest intentions.

A total of 1384 sites. 50% (673) - land lease manufactured homes. 50% (**661**) RV’s, Cabins & Glamping sites. RV’s that are allowed to hook up for 6 months, or potentially longer, at a time. Consuming our community’s resources with no interest in community building or supporting their neighbors.

Is this what the generations of families that came before us, and those here today that work tirelessly to build positive change, deserve. A doubling of our population, where 25% of Cle Elum residents are simply long terms “tenants” in a sea of RV’s. And another 25% are potentially struggling in a manufactured home on land they do not own, at the mercy of their developers’ financial priorities and less than sterling management reputation. A project design, that local law enforcement has clearly warned could be disastrous on this scale.

The City of Cle Elum, under the WA State GMA, is required to deny a Development Agreement if it does not properly mitigate impacts. There is simply no reasonable or adequate mitigation for the type of astronomical risks the Sun Communities current design strategy imparts.

Our areas “natural beauty, historic heritage and outdoor recreation assets” are a cornerstone of our economic future. Sun Communities interpretation of how those can be leveraged to profit their shareholders is not unlawful. It is just highly undesirable for a community of our size. If they ultimately prevail, other developers like them will not take long to also come knocking.

The community has spoken loudly that it is not supportive of what amounts to a public corporation establishing a private tourism community of such significant scale that it places substantial new risks on the existing community at large.

The original Bullfrog Flats Development Agreement is about creating an expanded “residential community” that allows for engaged citizens that can enjoy and continue the generational appeal of our area. It was carefully constructed so any new development would **contribute meaningfully, and participate equally**, in its future.

Sun Communities can build that. But it is **not enough profit** for them. They want you, our City Council, to bend to their will with a plan that creates wholesale changes in the types, distribution, and ownership of land use. That in and of itself violates the 2002 approved annexation of the Bullfrog Flats for the purpose of providing managed and responsible long-term growth through the creation of new neighborhoods that compliment our traditional generational small community.

You have an existing Comprehensive Plan and City Code that is fully compliant with the original Development Agreement. If the City Council feels that additional clarification and guidance for future developers is prudent, you can adopt a new ordinance precluding “Parks” within the city limits and can do that confidently knowing there are so many exceptional affordable housing options out there to meet the GMA requirements for the future. I would be thrilled to help you research this.

Yes, you are required to fairly consider any land use proposal. That is essential. But that is not an open invitation for developers to insist you accept their interpretation of our Comprehensive Plan language to fit their motives.

Motives, that in this instance, could leave your current citizens living in a community compromised financially and potentially unsafe to live in. The complexion of Cle Elum would change so significantly, it would be unrecognizable by those of us here today.

As the elected leadership of Cle Elum, you owe any developer a clear expectation for what types of residential development aligns with our Comprehensive Plan and GMA obligations. What Tourism and Recreation truly mean in the context of our city’s future economic development. Any developer is free to attempt to redefine all of that for you, but they not entitled to prevail at it.

I am fairly certain, next to the map with a **big green pin** stuck through Cle Elum, is a list of potential buyers for the Bullfrog Flats. Because Sun Communities is a business. And contingencies are part of their world. They can simply sell the land to another developer that would embrace and be content to build out the Bullfrog Flats the way it was intended to be 20 years ago.

A way that secures the best possible future for the larger population Cle Elum can then successfully embrace.

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