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I am adding these comments to the record regarding the 3BR custom cuts slaughterhouse/feedlot project, which is being proposed again in a residential neighborhood on Wilson Creek Road.

This project is asking for a conditional use permit since the property is in a residential neighborhood. Under Kittitas County Code **17.60A.015** it says,

"17.60A.015 Review criteria.

The Director or Board, upon receiving a properly filed application or petition, may permit and authorize a conditional use when the following requirements have been met:

1. The proposed use is essential or desirable to the public convenience and not detrimental or injurious to the public health, peace, or safety or to the character of the surrounding neighborhood.
2. The proposed use at the proposed location will not be unreasonably detrimental to the economic welfare of the county and that it will not create excessive public cost for facilities and services by finding that
 - A. The proposed use will be adequately serviced by existing facilities such as highways, roads, police and fire protection, irrigation and drainage structures, refuse disposal, water and sewers, and schools; or
 - B. The applicant shall provide such facilities; or
 - C. The proposed use will be of sufficient economic benefit to offset additional public costs or economic detriment.
3. The proposed use complies with relevant development standards and criteria for approval set forth in this title or other applicable provisions of Kittitas County Code.
4. The proposed use will mitigate material impacts of the development, whether environmental or otherwise.
5. The proposed use will ensure compatibility with existing neighboring land uses.
6. The proposed use is consistent with the intent and character of the zoning district in which it is located.
7. For conditional uses outside of Urban Growth Areas, the proposed use:
 - A. Is consistent with the intent, goals, policies, and objectives of the Kittitas County Comprehensive Plan, including the policies of Chapter 8, Rural and Resource Lands;
 - B. Preserves "rural character" as defined in the Growth Management Act (RCW [36.70A.030\(20\)](#));
 - C. Requires only rural government services; and
 - D. Does not compromise the long term viability of designated resource lands. ([Ord. 2019-013](#), 2019; [Ord. 2013-012](#), 2013; [Ord. 2013-001](#), 2013; [Ord. 2012-009](#), 2012; Ord. 2007-22, 2007; Ord. 88-4 § 11 (part, 1988; Reg 88-10, 1983)"

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These requirements have not been met or addressed in the latest application and revised SEPA from December 13, 2023.

There is no wastewater plan or stormwater management plan detailing how the project will handle the seasonal flooding/stormwater or plan to deal with the potential impacts created from a leak in the proposed settling pond/lake.

Where will the funds come from to clean up properties and domestic water wells down gradient from potentially contaminated run off?

The drainage issues on this property are very well documented, please see the public comments from last May 24, 2023. Many pictures were submitted demonstrating the southwestern portion of the property under water and flooded for a long period of time.

The construction of a pond/lake of this size will create vast amounts of muddy water that will have to be dealt with during excavation. In this area the surface water can be as shallow as 2 feet below land surface, it is hard to deal with this surface water when digging a ditch let alone a pond/lake.

Where will the muddy water created from the excavation of the pond/lake be discharged at? This discharge water will be constantly pumped throughout the excavation of the pond/lake, since this property already has drainage issues how will adding more water to an already saturated area work, how will it be contained to the property and not spill over to the ditch next to Wilson Creek Road or neighbors' properties?

The above questions alone demonstrate how this project at this residential neighborhood does not meet the review criteria listed in Kittitas County Code **17.60A.015**.

This project would ultimately change the overall character of the surrounding neighborhood and place undo burden upon all the neighboring properties.

I have also attached a few comments on the revised SEPA from December 13, 2023.

Thank you for your time.

Thank You

Jeremy Bach

COMMENTS ON (REVISED) SEPA APPLICATION

#2 AIR

No plan to address the overall odors created from a newly constructed settling pond/lake, it doesn't smell of dead animal byproducts in this neighborhood today. The extra fly and mosquito's habitat created from a settling pond/lake is also not addressed or even mentioned in the application.

#3 WATER

The current location of the existing well that would be used as a community well is located in or by the public access road as per the applicants' drawings submitted for comment on November 29, 2023.

Community wells need to have a 100ft radius in all directions as a sanitary area, this existing well does not, it is also located in an area that floods every spring as documented in my public comments from May 24, 2023.

The proposed mitigation water used for this project is intended as domestic use mitigation. This project is an industrial use and should require industrial use mitigation not domestic use. These 2 water uses are not interchangeable and are vastly different from one another.

Since most of the water being used on this project IS NOT going through a subsurface drain field and IS being exposed to the surface in a settling pond/lake the consumptive use is far greater due to evaporation and not being directly recharged in the subsurface.

This large settling pond/lake is meant to deal with animal waste and by product. The excavation and construction of this pond/lake would create many issues on its own for all neighboring properties.

Erosion and vast amounts of muddy, turbid water will be discharged onto the ground for long periods of time while the pond/lake excavation takes place, this would add water to an already high-water table. There is no plan on how to contain that wastewater on site or a discharge plan. With the already high-water levels on the property the ground would not take this extra water being added and wastewater would end up in properties down gradient from this project and drain into the Wilson creek ditch which already has flooding issues in the spring; please see pictures from my public comments from May 24, 2023.

#7 ENVIRONMENTAL HEALTH

There is nothing in the application to deal with the high concentrations of phosphorus and nitrates that are created from slaughterhouse/feedlots.

The current site plan has the holding pens and facilities up gradient from the existing community well and flood area which are directly located within 150 ft of the Wilson Creek Road ditch.

This would have a potential to drain towards the well/flood area into Wilson Creek Road ditch and negatively effect everyone down stream of this project.

#14 TRANSPORTATION

There is no mention of how to deal with the impacts to travel on Wilson Creek Road. The main route of travel will go through lower Wilson Creek Road which already has an upheld lower speed limit due to high residential use.

Per the drawings, on November 29, 2023, it shows a 30-lot parking area. This parking lot is also located up gradient from the community well.

This large parking area is not even discussed in the SEPA application, and it does not outline how they are going to address the stormwater runoff created from this 30-car parking lot.