



# KITTTITAS COUNTY COMMUNITY DEVELOPMENT SERVICES

411 N. Ruby St., Suite 2, Ellensburg, WA 98926

CDS@CO.KITTTITAS.WA.US

Office (509) 962-7506

Fax (509) 962-7682

"Building Partnerships – Building Communities"

March 25, 2019

Washington State Department of Natural Resources (landowner)  
713 Bowers Road  
Ellensburg, WA 98926

Diego Hernandez, Velocitel (agent/proponent)  
4004 Kruse Way Place, Suite 220  
Lake Oswego, OR 97035

**RE: Transmittal of Comments – ATT Teanaway Cell Tower Transmittal of Comments and Request for Additional Information (ACU-19-00001)**

All interested parties,

Enclosed are the comments received regarding the ATT Teanaway Communication Tower (ACU-19-00001) during the comment period:

March 1, 2019	Chad Unland, Natural Resources Specialist, Washington State Department of Natural Resources
March 4, 2019	Pat Deneen, Developer
March 4, 2019	Holly Erdman, Kittitas Environmental Health Specialist
March 7, 2019	Mark Cook, Director, Kittitas County Public Works
March 12, 2019	Gwen Clear, Environmental Review Coordinator- Washington Department of Ecology
March 14, 2019	Taylor Gustafson, Environmental/Transportation Planner- Kittitas Public Works
March 15, 2019	Mike Flory, Kittitas Building Official
March 15, 2019	Jesse Cox, Kittitas Environmental Health Supervisor
March 15, 2019	Scott Downes, Washington Department of Fish and Wildlife Area Habitat Biologist

Please review and respond to all comments. You may respond individually or combine responses related to topics. Both the landowner and the agent (whom we understand to be the proponent) are included in this transmittal. We expect that the agent will be the one responding to these comments.

A request for additional information based upon the comments above and staff review will be sent no later than April 1, 2019. If you have any questions, please do not hesitate to contact me.

Sincerely,

Dusty Pilkington  
Staff Planner

*Enclosure*

cc: Lindsey Ozbolt, Planning Official

*via email*

**From:** [UNLAND, CHAD \(DNR\)](#)  
**To:** [Dusty Pilkington](#)  
**Cc:** [LEACH, LARRY \(DNR\)](#); [Mink, Kathryn \(DNR\)](#); [FROMHERZ, MATT \(DNR\)](#); ["Diego Hernandez"](#)  
**Subject:** ACU-19-00001 ATT Teanaway Cell Tower Notice of Application  
**Date:** Friday, March 01, 2019 1:06:56 PM

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Hi Dusty:

ACU-19-00001 ATT Teanaway Cell Tower Notice of Application:

Comments from the Washington State Department of Natural Resources (DNR) are as follows:

1. Diego Hernandez is not an agent for the landowner; he is a proponent requesting a lease.
2. An application for a communication site lease must be submitted to DNR.
3. The SEPA checklist involves State land managed by DNR, as the Teanaway Community Forest.
4. DNR will need to approve any permit applications and sign off as Landowner, if we concur.
5. Section A-10 should read that, "a lease from the DNR is required before any construction can begin."
6. DNR will not allow a diesel generator, propane may be allowed, but DNR would request that power be part of the project requirements. At a minimum, we need to see a quote from the power company to install an electrical service.
7. A historical/cultural survey of the proposed com site property needs be completed and reviewed by DNR in draft form.
8. Any permit issued by the county, should be subject to a lease being issued by DNR.

**Chad Unland**

Natural Resources Specialist

Southeast Region, 713 Bowers Rd. Ellensburg, WA 98926

Washington State Department of Natural Resources (DNR)

509-925-0935

[chad.unland@dnr.wa.gov](mailto:chad.unland@dnr.wa.gov)

[www.dnr.wa.gov](http://www.dnr.wa.gov)

**From:** [Pat Deneen](#)  
**To:** [Dusty Pilkington](#)  
**Subject:** ACU 19-00001  
**Date:** Monday, March 04, 2019 2:08:55 PM

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Dusty

Please send me a copy of the ACU-19-00001 file, including but not limited to the SEPA, Application, Maps showing the location of the tower, any and all other submissions by the applicant regarding this file.

This site is next to our Historic Dunford Barn and we worked with the wind fams to insure there was no damage to the view corridor surrounding the Dunford barn during the siting of the wind towers.

Thanks .. Pat

--

Pat Deneen  
509-260-0462

**From:** [Holly Erdman](#)  
**To:** [Dusty Pilkington](#)  
**Cc:** [Jesse Cox](#)  
**Subject:** RE: ACU-19-00001 ATT Teanaway Cell Tower Notice of Application  
**Date:** Monday, March 04, 2019 11:18:00 AM

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Dusty,

The project does not propose any structures on site and therefore, will not have any on-site sewage disposal needs or any need for groundwater withdrawal.

Thank you,

**HOLLY ERDMAN**  
**ENVIRONMENTAL HEALTH SPECIALIST**  
**KITTITAS COUNTY PUBLIC HEALTH DEPARTMENT**  
**507 N. NANUM STREET, SUITE 102**  
**ELLENSBURG, WA. 98926**

**509-962-7580**

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**From:** Dusty Pilkington  
**Sent:** Thursday, February 28, 2019 9:52 AM  
**To:** Kim Dawson; Julie Kjorsvik; Lisa Lawrence; Patti Johnson; Kelly Bacon; Candie Leader; 'jessica@yakama.com'; 'jmarvin@yakama.com'; 'johnson@yakama.com'; 'enviroreview@yakama.com'; 'separegister@ecy.wa.gov'; 'sepaunit@ecy.wa.gov'; 'gcle461@ecy.wa.gov'; 'lowh461@ECY.WA.GOV'; 'migi461@ECY.WA.GOV'; 'Downes, Scott G (DFW)'; 'Nelson, Jennifer L (DFW)'; 'SEPA (DAHP)'; 'jorgenja@cwu.edu'; 'nelmsk@cwu.edu'; Mike Flory; Douglas Mitchell; Stacey Henderson; Steph Mifflin; 'Mau, Russell E (DOH)'; 'ben.serr@doh.wa.gov'; 'brenda.smits@doh.wa.gov'; 'becky.kennedy@dnr.wa.gov'; 'cindy.preston@dnr.wa.gov'; 'rivers@dnr.wa.gov'; 'brooksideconsulting@gmail.com'; 'tribune@nkctribune.com'; 'terry@nkctribune.com'; 'chelberg@usbr.gov'; 'Joanna Markell'; 'legals@kvnews.com'; Karen Hodges; Justin Turnbull; Taylor Gustafson; 'Michael.j.daniels3.civ@mail.mil'; 'Kimberly.peacher@navy.mil'; Pat Nicholson; Tristen Lamb; Holly Erdman; Candie Leader; 'elizabeth.torrey@dfw.wa.gov'; 'brooksideconsulting@gmail.com'; 'Deborah.j.knaub@usace.army.mil'; Toni Berkshire; Jesse Cox; Jeremy Larson  
**Cc:** Lindsey Ozbolt; Dan Carlson  
**Subject:** ACU-19-00001 ATT Teanaway Cell Tower Notice of Application

Greetings. I am requesting comments on this Administrative Conditional Use Permit . Anyone with an interest can comment, and the comment period ends March 15<sup>th</sup>, 2019. Click the links below to view information on the permit. If you have no comment on the project, please reply and inform CDS.

[ACU-19-00001 ATT Teanaway \(County Departments\)](#)

[ACU-19-00001 ATT Teanaway \(Outside County Network\)](#)



## **KITTITAS COUNTY**


### **DEPARTMENT OF PUBLIC WORKS**

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**TO:** Dusty Pilkington, Planner I

**COPY:** Taylor Gustafson, Planner III  
Candie Leader, Administrative Assistant

**DATE:** March 07, 2019

**FROM:** Mark R. Cook, Director 

**RE:** ACU-19-0001 Teanaway Cell Tower

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Please see our comments regarding the proposed Teanaway Cell Tower listed below.

1. **Access**  
The access roadway shall meet the current Kittitas County driveway standard. Greater than 150 feet in length requires a 16 foot all weather surface with two foot clear zones on each side.
2. **Stormwater**  
The creation of greater than 5,000 square feet of new impervious area requires biofiltration swales along the perimeter edge of impervious surfaces allowing treatment and disposal of new impervious area.
3. **Hazardous Slopes**  
The application suggests that potentially hazardous slopes are associated with the tower parcel. Improvement construction should avoid getting too close to steep slopes particularly where the infiltration of improved runoff is likely to occur.



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

March 12, 2019

Dusty Pilkington  
Kittitas County Community Development  
411 N. Ruby St., Suite 2  
Ellensburg, WA 98926

Re: ACU-19-00001

Dear Dusty Pilkington:

Thank you for the opportunity to comment during the optional determination of nonsignificance process for the ATT Teanaway Cell Tower project, proposed by Washington Department of Natural Resources. We have reviewed the documents and have the following comments.

#### AIR QUALITY

This proposal does not specify whether it includes an emergency generator(s). If it does, note that stationary emergency internal combustion engines (emergency generators) with aggregate brake horsepower greater than 500 brake horsepower require a preconstruction air quality permit. For information regarding air permit applicability and/or process, please contact **Ryan Vicente** at (509) 454-7899 or [ryan.vicente@ecy.wa.gov](mailto:ryan.vicente@ecy.wa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Gwen Clear".

Gwen Clear  
Environmental Review Coordinator  
Central Regional Office  
(509) 575-2012  
[crosepacoordinator@ecy.wa.gov](mailto:crosepacoordinator@ecy.wa.gov)

201901124





## KITITAS COUNTY DEPARTMENT OF PUBLIC WORKS

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### MEMORANDUM

TO: Community Development Services  
FROM: Taylor Gustafson, Environmental/Transportation Planner  
DATE: March 14, 2019  
SUBJECT: Teanaway Cell Tower ACU-19-00001

TG

The Department of Public Works has reviewed the permit for the Teanaway Cell Tower Conditional Use Permit and has the following comments:

#### Planning:

- A. Site Access and Addressing Permits: The approach is located on State Route 97 and will require an approval from WSDOT. A copy of the access approval from WSDOT needs to be submitted with the access/address permit for the project site.
- B. Access and address permit required: The access road to the cell tower will need to be constructed to Kittitas County Code Chapter 12.04.080 Table 4-4 for a driveway over 150' in length.
- C. Fire Apparatus Turnaround: A Fire Apparatus Turnaround will need to be constructed to International Fire Code Appendix D. The turnaround needs to be within 150' of the structure.
- D. Storm Water Plan: A single monopole does not require a storm water plan.
- E. Grading Permit: A grading permit may be required for any dirt work exceeding 100 cubic yards of material. Please check



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"Building Partnerships – Building Communities"

March 15, 2019

Dusty Pilkington  
Staff Planner  
Kittitas County Community Development Services  
411 No Ruby Street, Suite 2  
Ellensburg WA 98926

RE: ACU-19-00001 ATT

Dear Mr. Pilkington,

Thank you for the opportunity to comment on the above listed Application.

1. All construction of buildings shall conform to the International Building Codes as adopted at the time of building permit submittal. All buildings over 120 S.F. require a building permit including equipment storage structures.
2. All tower construction per IBC 3108 and TIA-222 and a building permit is required by CDS Building Division.
3. A generator shall be permitted by the Fire Marshal's office.
4. Fuel storage such as propane tanks shall require a permit by the CDS Building Division.
5. Solar array shall require a permit by the CDS Building Division.
6. Any fence over 7'-0" in height shall require a permit by CDS Building Division.
7. Any retaining wall over 4'-0" in height shall be designed by an architect or engineer and permit required by CDS Building Division.

Please don't hesitate to contact me should you have any further questions.

**MIKE FLORY**

Mike Flory,  
Building Official





*To Protect and Promote the Health and the Environment of the People of Kittitas County*

## Memo

To: Dusty Pilkington, Planning Official  
From: Jesse Cox, Environmental Health Supervisor  
Date: Mar 15, 2019  
Subject: ACU-19-00001

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Thank you for the opportunity to comment on the ATT Teanaway cell tower project regarding water and septic requirements to comply with Kittitas County Public Health Department's Environmental Health requirements. The project does not propose any structures on site therefore, will not have any on-site sewage disposal or groundwater withdrawal needs. No information is required for further review prior to any determinations leading to recommendation for approval.



507 N. Nanum Street, St. 102 · Ellensburg, WA 98926  
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[www.co.kittitas.wa.us/health/](http://www.co.kittitas.wa.us/health/)



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Region 3 • 1701 South 24<sup>th</sup> Avenue, Yakima, WA 98902-5720  
Telephone: (509) 575-2740 • Fax: (509) 575-2474

March 15, 2019

Dan Carlson, AICP  
Community Development Services Director  
411 North Ruby St., Suite 2  
Ellensburg, WA 98926

RE: WDFW Comments on AT&T Teanaway Cell Tower ACU-19-00001

Dear Mr. Carlson,

Thank you for the opportunity to comment on the Administrative Conditional Use Permit for a cell tower located on the Teanaway Community Forest (ACU-19-00001), henceforth referred to as "the project". Washington Department of Fish and Wildlife (WDFW) has reviewed the application and supporting documents. This proposed cell tower is located on the Teanaway Community Forest (TCF), of which WDFW is a co-manager of the forest along with Department of Natural Resources (DNR). The management plan adopted for the TCF sets clear indicators that the forest must be managed as a working forest while conserving values for species habitats along with recreation interests that are consistent with watershed protection.

To protect these resource values on the TCF and make sure that the proposed project is consistent with management goals of the forest, WDFW requests that the following items be clarified and provided to WDFW and DNR prior to the project being approved and constructed.

1. The project is generally following USFWS guidance for avian protection measures on cell towers, but need clarification or modifications on two points—1. They say no external lighting is planned for the project, but the project should clarify that is true for all external buildings. If any exterior lighting is used, it should be downward facing. 2. There is no exclusion device planned for the top of the tower. If the current design is constructed (see below on proposed alternate design), the project should install a raptor nest exclusion device so that there are not conflicts between raptor nest and cell tower function. There are other trees in the vicinity (potential alternate nest sites), so installing a nest platform as compensation isn't necessary.
2. The project needs to provide more details on the facilities;
  - a. more details on perimeter security fence installed (it needs to be at least 8 foot in height to exclude deer and elk and of a design that will not harm wildlife, single strand barb wire or no top wire),

- b. explanation of why the solar panel array and the propane tank is outside of the fence-this is public land, so are there concerns over public having access to either the panels or the propane tanks,
  - c. clarification on the generator plan, the SEPA checklist states a diesel generator, yet the plans show a propane generator and how do the solar panel array factor into the plan,
  - d. details on proposed retaining wall for slope stability on the western end, such as a grading plan, what is the footprint disturbance that will need to be restored.
3. Weed control; the project is installing a weed block in their fenced area, but no details on how any other disturbed land will be managed for weed control.
4. Fire control; the project needs to address how they are ensuring that fire will not be an issue at the site, with propane tank and electrical items such as generator and solar panel array. Further details on the access road are needed-will it be fully rocked so no veg is growing up in the road and creating a potential vehicle hazard for fires?
5. Revegetation of any disturbed soils; the project is up in thin lithosol soils, they need to do soil management so that the topsoil can be set aside and replaced on top for best success in reseeded. The project should consult with WDFW on revegetation plan of disturbed areas and suitable native seed mix.
6. Aesthetics, to make the tower more easily blend into the forested landscape, the project should consider replacing the proposed lattice tower with a monopine tower which is more aesthetically in line with the surrounding forest for both habitat and recreational interests.

Prior to construction the project developer needs to provide these details to WDFW and DNR to ensure that the project is compatible with land management of the TCF. Please contact me at (509) 457-9307 or [Scott.Downes@dfw.wa.gov](mailto:Scott.Downes@dfw.wa.gov), to discuss further details on these items.

Sincerely,



Scott Downes  
Area Habitat Biologist

Cc: Perry Harvester, WDFW  
Mike Livingston, WDFW  
Larry Leach, DNR