



KITTITAS COUNTY COMMUNITY DEVELOPMENT SERVICES

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"Building Partnerships – Building Communities"

February 22, 2013

Mr. Larry Condon, Managing Member
PacifiClean Environmental
111 N. Post, Ste. 200
Spokane, WA 99201

RE: PacifiClean Compost Application, CU-13-00001

I write this letter in regards to the review status, additional fees, and additional information that will be necessary before we can continue processing the application or issue a threshold determination required by the State Environmental Policy Act (SEPA) for the proposed PacifiClean Composting project.

While we deemed your application for the proposed PacifiClean operation "complete" on February 22, 2013, we have determined after further review of the proposal that there are potential significant impacts that could result from the project. Therefore, we consider the project "exceptional in scale and complexity" and that a Development Agreement is appropriate per the Kittitas County Code (KCC) 15A.11.020(5)(i), and that such additional processing fee is necessary to adequately and appropriately process the application. KCC 15.04.120 regarding Mitigated DNS, permits the County to issue a DNS provided conditions for the proposal are met to mitigate anticipated and identifiable significant impacts. While the applicant has submitted studies to analyze and propose mitigations to the impacts from the proposed project, preliminary examination of the studies shows that some of the issues addressed require further evaluation.

The Development Agreement requested will involve the re-imbusement of actual costs for staff, consultants needed for review, hearing examiner, advertising, communications, postage and any public notice expenses since the processing of this application significantly exceeds the base fee for the application and SEPA review that you have already submitted to have the application deemed "complete." Expenses invoiced will be payable prior to hearing, and a final billing will be issued after this hearing, which will include cost for the Hearing Examiner, and will be paid prior to the decision becoming effective.

A number of environmental issues need further evaluation and will require a substantial amount of staff time to review such analysis. Such issues include:

1. **Visual Impact.** While you provided a grade analysis between roads, it is not sufficient to analyze the impact of the site upon view from the road of entry or from I-90. There are no pictures of the site from the roadways and trails from where the operation can be seen. These pictures must have the proposed operation imposed upon the pictures at a minimum in order to determine visual impact and potential mitigation of such impacts. The project is proposed along the "Mountains to Sound Greenway Scenic Byway" and the visual impact of the proposal upon this scenic route will have to be investigated in much greater detail. Analysis should be made from several points along I-90 east and west bound lanes, the Thorpe Prairie Road, and the John Wayne Trail.
2. **Odor Impact.** You briefly address how odor will be monitored and name the technique that will be used to control the odor. However, you provide no existing test results which substantiate

that your proposed method of odor control is functional and efficient. Methods of odor impact evaluation will have to be provided to indicate more precisely how the odor will be controlled in addition to being monitored. Odor test results from other operations using the proposed GORE system will have to be provided in order to support that it "meets or exceeds regulatory requirements," and indicate what regulatory requirements to which you are referring. With use of the proposed stormwater ponds and leachate tanks, you will have to substantiate why these systems "should be sufficient," and odors "not expected," to be "more than typical." Also, the site is located within an area surrounded by hills that creates a "bowl" geographical area that can trap stagnate air in the early spring and late autumn months. How will dust and odor be monitored and controlled so that it does not affect this area?

3. Dust Impact. Regarding dust issues, it will be necessary to describe under what circumstances the "piles without a cover" will occur, and how dust will be controlled in those circumstances. Dust in this windy environment is a very important issue and it may be necessary to dump inside an enclosed structure. It is indicated that there is an option of covering or keeping the piles moist, but the exact operation proposal will have to be explained. In other areas of the report, it indicates that piles will always be covered except to haul away. What will be the dust impact when the dry piles are uncovered for deportation? The control technique will need greater explanation and validation of dust control.
4. Noise Analysis. The map provided is not legible and should provide a colored aerial which shows location and distance of residences. You have indicated that this process is "industrial" which it may be considered in the urban environment. In the rural environment in which it is located, an industrial activity is not permitted. You have a commercial agriculture activity which is justified under the current ordinance with approval of a conditional permit for "feed mills, canneries and *processing plants for agricultural products*. This change in the analysis will not impact the results of the study, which shows no noise impacts over existing residential areas.
5. Wetland. The wetland analysis should include analysis of land east of the canal even though it is not proposed for use in the process. This is needed to determine if any impacts upon wetlands may occur on lands *owned by the applicant*.
6. Traffic. You have addressed the issues related to the flow of traffic. But the intersection from I-90 to the site has conditions that will have to be mitigated in order to accommodate additional traffic for the size of anticipated vehicles with the least impact upon existing traffic. No analysis has been provided indicating turning patterns of trucks and how much space will be necessary so that a turning truck is not impeding upon the space of a passenger vehicle or other truck moving in the opposite direction within the appropriate lane of traffic. This will have to be provided.
7. Road Construction. The geotechnical report for the access road, Thorpe Prairie Road, is adequate. However, there is no indication in any other report of how the road will be improved and to what standards, how road surface water will be managed, and, as mentioned above, how introduction of heavy vehicles will affect existing roads and traffic.
8. Stormwater and groundwater control. Comments have been made within your report about the stormwater and groundwater control upon the site and how the water upon the site will be recycled for composting process. You have mentioned in past meetings that no water from the operation will leave the site by filtering it through holding ponds. The ponds are shown on the site plan, but the process used to collect water and reuse it does not appear to be fully explained. We will have to examine this in greater detail. Also Health has concerns with the

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method use to prevent solid waste material from being in the uncovered intersite road ways. If the precipitation comes into contact with this material it is "leachate" and not "stormwater."

9. Fire Control. A number of issues will have to be addressed related to fire. This has become a very important issue in Kittitas County since the outbreak of the significant fires during last summer, and plans for containment of any potential fire on site must have more detailed description of response in the event of fire than simply "cordoned off and ...calling 911." The Fire Marshall is requesting a full hydrant system NFPA and IFC compliant in regard to certification as a fire pump, a minimum of nine hydrants (and perhaps more) for this site upon full build out, a fully automated and monitored sprinkler system at the Tipping Building, a layout and locations of the water lines intended for fire suppression, and an illustration of pile locations insuring that piles are no less than 20 feet apart. While engineering of water lines and access is not required at this time, we must have enough information to know that this necessary protection can be provided.
10. Where is rejected material going to end up if the hauler is unwilling to pick up the material or does not want to transport it back over the pass? Is there a method that will determine if the waste is acceptable before it is transported to the site?
11. Optional sites. It has been mentioned more than once that other sites were considered for this operation. There should be some explanation why this site was chosen over others and addressing some of the issues that are mentioned above. While you are not required to address this within your application, it is our obligation to take this into consideration in making a threshold determination under SEPA. There are over 400 acres of unused industrial land within Kittitas County, and are within areas which would not have the same environmental impacts as upon the site that has been chosen. There should be some indication why this site was chosen over others.

We need to discuss the Development Agreement as soon as possible so that we can proceed with review and threshold process. Please contact me with any questions you might have. Thank you.

Sincerely,



Robert "Doc" Hansen
Planning Official

cc Neil Caulkins, Deputy Prosecuting Attorney
Kirk Holmes, Public Works Director
Doug D'Hondt, County Engineer
Jan Ollivier, Transportation Manager
Brenda Larsen, Fire Marshall
James Rivard, Environmental Health Supervisor
Lindsey Ozbolt, Planner
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Peter Moon, O2Compost
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