

**To Kittitas County, Planning Dept.
SEPA Conditional Use Permit – Use Change Application
Project Name: Apostolic Faith United
Project No. CU-22-00001**

I (Chad Unland) am a neighbor to Walter Davenport and his wife Lynn and think highly of them both. We have been neighbors for the last 10 years. When I purchased my home in 2012, I was recently divorced with two teenage children. I observed what appeared to be a church ran by Mr. Davenport (whom I understood to be the Pastor) and a construction yard where Walter and his employees (Davenport Construction) operate their business each weekday (and sometimes, weekends), just north of 180 Rein Road. There are storage containers, lumber, and other construction materials where materials are picked up and dropped off several times per day.

I placed an offer on the lot next door and assumed Mr. Davenport was working with the county, and had obtained all permits, as a man of integrity. I went to the County to request permits allowing me to put my 2006 Kit doublewide manufactured home upon the eastern portion of the lot (which was an upgrade to the existing use, a singlewide and an existing log home). The log home later became my residence. I requested the county segregate my lot into two lots. My permits were issued however my request to segregate was denied.

In 2018, my wife observed a lot of activity from the church next door and thought it odd, as she had knowledge of acceptable business practices for churches. She emailed the county to inquire and learned that Mr. Davenport did not obtain permits for his business operations.

I would like to see the county allow this conversion but would like to see improved plans to control access, take long term planning needs of the community into account as these conversions are envisioned by growth management, and see conditions prescribed in the conditional use permit. Mr. Davenport was living in the house until sometime around 2019, when he built a separate home and only church services, farming, and staging for his construction company are the existing uses occurring there now, as far as I can tell. The residential uses along Rein Road will benefit from having a long-term plan, which improves the churches access, marketing, while lessening impacts to the residential uses along Rein Road.

As written in the current SEPA Checklist, I object to the conversion of this home from a home/residence to a religious institution, in essence a commercial use, and do not think the county should issue a conditional use permit, to allow it as is, for the following reasons:

- 1) I find the way Mr. Davenport describes the use of his property to be incomplete and misleading. Does Mr. Davenport also intend on permitting the construction use of the property? As an existing use, I would expect to see this included in his SEPA checklist. The SEPA Checklist instructs the applicant to answer each question accurately and carefully, to the best of your knowledge. Certain uses as existing are not described and as written, it does not accurately describe the activities occurring on the parcel. This is very important as we discuss the potential change in use of this parcel. The SEPA Checklist informs the applicant that the checklist applies to all parts of your proposal, and they are not completely described under SEPA Checklist No 11.
- 2) SEPA Checklist: A. Background – No. 6. Does Mr. Davenport, or in this case, the Apostolic Faith United Church have an operating plan for the Church? What will be its regular business hours?

Are there, or is there, any planned structure for the church's hierarchy? Do they have a business plan? Who will manage the church (in the future, as this will be our neighbor), now that Mr. Davenport has moved away? Will the church manager have a "parsonage"? Does the church have bylaws or articles of incorporation, filed with the Secretary of State or other, which can be reviewed?

- 3) SEPA Checklist: A. Background – No. 8, he states no environmental information is known directly related to this proposal. Was the septic system designed to accommodate 80 people, or was it permitted for residential use, with a single family? What about the increase in water use, and the conversion of water from residential to commercial? Was the well drilled under residential exemption? Does the church manager live on site in a parsonage? The applicant should have provided the accurate responses here.
- 4) SEPA Checklist: A. Background – No. 10, will a water right be needed? Will a septic permit be needed?
- 5) On the SEPA Checklist, the Use of the lot in No. 11, and Location, in No. 12, were left blank. I inquired and the response from the County, informed me *"The SEPA Checklist is associated with a Conditional Use Permit, so answers to 11 and 12 are provided within the CUP application materials."*

As the reader of this SEPA Checklist I have tried to locate the separate CUP application materials and I am not confident or sure that I understand the proposed use of the lot, in this conversion. Can the applicant redraft portions of the checklist and give complete answers? I understand the location but would like to see a rewritten and complete answer to SEPA No. 11.

- 6) The SEPA Checklist under Section 3.b.1, Ground Water, states no water will be used. As mentioned above, was the allowed use a residential exemption, for a small family, and will a permit, or water right, from the department of ecology be required? Additionally, the surface water diversion should have been described in 3.a.4.
- 7) The SEPA Checklist under Section 3.c.1, does not describe the water runoff from the asphalt or roof as impervious surfaces. Is a stormwater runoff plan needed, as would be typical for any commercial business, before development would be allowed? Will the parking lot need expanded to accommodate 80 cars?
- 8) As mentioned above, the SEPA Checklist under Section 7.a. and 7a.1, the applicant should describe the use of the lot for a construction staging area, safety plans, and outline any hazardous materials, which may or may not be stored on this segment of the property.
- 9) The SEPA Checklist under Section 7.a.4, should outline how emergency service use may be needed as an additional 80 parishioners who will attend church services, as fire or health services may be needed. What about defined ingress/egress to the site, required fire connections (for commercial use), and route? The current access is not acceptable. Will a better access plan, to accommodate the growth, be required?
- 10) The issues above (in SEPA no.7) must be addressed before the county should consider this application and potential permit.
- 11) This leads into my comments for SEPA Section 8., What is the current use of the site? The applicant should also address the agricultural applications, the construction staging area, the residential use, in addition to the church presence, as these are all the current uses. The county should require Mr. Davenport to remove the construction staging area from the site, if not described in this Checklist. I am aware of tax exemption status available and the fact that Mr. Davenport seems to have 100% of the lot used for the Church? What are the county's rules for these multiple uses occurring on this lot? I would estimate the land encumbrance at 80% Ag,

10% residential/church, and 10% construction and staging. What is Mr. Davenport’s fair share of county taxes for this lot? Is the use of this lot exempt from any taxation? Has the county allowed the exempt status, even though the uses were not permitted? What is the county’s policy or procedure in this practice? See the snip(s) below from the county’s web site, as the site is used as a residence, no taxes are collected.

Owner's Name	Ownership %	Owner Type
APOSTOLIC FAITH UNITED	100 %	Owner

Sales History
No Sales History

Building Permits
No Building Permits Available

Historical Valuation Info

Year	Billed Owner	Land	Impr.	PermCrop Value	Total	Exempt	Taxable
2023	APOSTOLIC FAITH UNITED	\$77,460	\$0	\$0	\$77,460	\$0	\$77,460
2022	APOSTOLIC FAITH UNITED	\$77,460	\$0	\$0	\$77,460	\$0	\$77,460
2021	APOSTOLIC FAITH UNITED	\$77,460	\$0	\$0	\$77,460	\$0	\$77,460
2020	APOSTOLIC FAITH UNITED	\$77,460	\$0	\$0	\$77,460	\$0	\$77,460
2019	APOSTOLIC FAITH UNITED	\$77,460	\$0	\$0	\$77,460	\$0	\$77,460

5 Year Tax History

Type	Statement Number	Taxes	Assessments	Fees	Balance Due
Real Property	2022-951598	\$0.00	\$0.00	\$0.00	\$0.00
Type	Statement Number	Taxes	Assessments	Fees	Balance Due
Real Property	2021-951598	\$0.00	\$0.00	\$0.00	\$0.00
Type	Statement Number	Taxes	Assessments	Fees	Balance Due
Real Property	2020-951598	\$0.00	\$0.00	\$0.00	\$0.00
Type	Statement Number	Taxes	Assessments	Fees	Balance Due
Real Property	2019-951598	\$0.00	\$15.63	\$0.00	\$0.00
	Receipt Number	Receipt Date	Taxes/Fees	Interest Paid	Total Paid
	2019-0843062	05/14/2019	\$15.63	\$0.00	\$15.63
Type	Statement Number	Taxes	Assessments	Fees	Balance Due
Real Property	2018-951598	\$0.00	\$15.63	\$0.00	\$0.00
	Receipt Number	Receipt Date	Taxes/Fees	Interest Paid	Total Paid
	2018-0780775	05/11/2018	\$15.63	\$0.00	\$15.63
Type	Statement Number	Taxes	Assessments	Fees	Balance Due
Real Property	2017-951598	\$0.00	\$13.63	\$0.00	\$0.00
	Receipt Number	Receipt Date	Taxes/Fees	Interest Paid	Total Paid
	2017-0717376	05/10/2017	\$13.63	\$0.00	\$13.63

12) Second part to SEPA 8.a, will this affect the adjacent land uses? Mr. Davenport answers NA. For the record, Na means Sodium. Mr. Davenport could provide the backlash (N/A) if he meant, Not Applicable. If that is what he means, I disagree. The increased traffic to and from the lot, if used to regularly serve 80 carloads of traffic, would affect adjacent uses as there would be more noise, and use. Also, if Mr. Davenport does not plan to describe the construction use here, in

SEPA, then I would expect that use to be discontinued and see all debris and equipment to be cleaned up. If not, how will those uses be allowed to continue as conditionally approved by the county? This needs to be discussed. Mr. Davenport uses his lot near the "residence/church" as a store yard for his construction materials, and large semi-tractor trailer trucks come and go frequently. Damage to the road, the road surface, and culvert (I suspect), have been done by the Semi-tractor trailers and the forklifts that unload them, as they turn. This is because the radius is not adequate as Rein Road is not wide enough to come and go out of the lot's driveway, which is near a drainage and used by the irrigation district as a main lateral. Again, NA is not adequate to address this issue, as uses of the land are required to be discussed here, SEPA no. 8. This outlines how this SEPA checklist is not accurate, as I need to understand the current use, and the proposed future use, to clearly understand what Mr. Davenport is describing, and how I may be affected. Then I can comment, completely.

- 13) SEPA 8.b. the response should be working farmlands. And how much was or is being used for the proposed industrial/commercial use?
- 14) SEPA 8.f, the county may correct the applicant, as the comprehensive plan for this site, is likely not, "One Building." If it is a zoning designation, please let me know what this is.
- 15) SEPA 8.i, are 2 people going to live there when permitted at church? Is this common practice for people to live at a church? Will the church manager be bi-vocational and bring an additional business such as a daycare or preschool to the church property? His plan needs to describe who will -be living and what the future use is, "as envisioned." How frequently will permanent staff be changed, as it is nice to know your neighbors, and contacts for emergency.
- 16) SEPA 8k. and 8L, should be completed after the future use has been adequately described.
- 17) SEPA 9.a should be one, if the church is also permitted to be used as a residence.
- 18) Under SEPA Section 13.c and 13.d, he should address what methods were used for the review of cultural resources at this site, as NONE should not be an acceptable response.
- 19) Section 14 was not completed and needs to address impacts to Rein Road and Road No. 6.
- 20) Under Section 14.h, I would like to see mitigation measures required for the increased use from this site, along with whatever other uses the county may permit under the conditional use permit. If this is permitted for commercial church activities, I would like to see the county require a turn out for traffic be established off Road No. 6. Signage for the church could be seen, and access turn outs, and perhaps sidewalks, wide enough to accommodate the additional use. My biggest objection to this site (and proposed use), is the additional traffic (going on now), and having a plan that accounts for all the noise all times of day and night.

Examples:

- On June 3rd, 2022, three trucks arrived at 11:30 pm, unloaded equipment and made significant noise. If this is permitted, measure to reduce these issues and noise disturbances in the middle of the night, along with plans to address the increased traffic, can be minimized and addressed through this SEPA process.
- Several years back, a young gentleman sat outside my open bedroom window, at the creek across Rein Road, and I could hear his conversation out loud, as he was apparently speaking to God. It was late at night, around 2am, and I would like to see the church enact measures to its future use, to minimize the impacts to the existing residential uses. He questioned life and I was not sure if he was suicidal, and something I did not want to deal with a 2 am.

- The map below highlights how the conditional use permit should be approved, as it mitigates the impacts, and allows the church to grow and thrive with better access and marketing to grow and in ways that help improve the community. I would like to see this be Mr. Davenport's legacy.
- In September 2012, hay fronting the church caught fire and burned the church as well, it was not a total loss, but I highlight this as fire and emergency services are needed, and plans should account for these circumstances.



Thank you for the opportunity to comment and I hope my comments will be considered as this project moves forward.