

Paul White
6390 Cove Rd.
Ellensburg, WA 98926

June 23, 2008

To: County Commissioners

cc: Mackenzie Moynihan Staff Planner ✓
County Attorney

From: Paul E. White, 6390 Cove Road

Paul E White

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JUN 23 2008

**Kittitas County
CDS**

Re: B&J Preliminary Plat (LP-08-21)

Craig and Reesa Duncan are proposing 7-3 acre subdivision on 21.57 acres bordering my property on the east and north sides. The Duncan's now reside on the property and have a driveway on the northern boundry of my property. There are also utility boxes and other infrastructure in place.

The SEPA document submitted to the county does not adequately identify some key problems with this subdivision. Here are the specifics regarding the environmental elements as stated by the applicant.

1. In the application under "Earth": It is stated that "gravel and rock with a minimal amount of topsoil".

In truth, based on the findings of the USDA Natural Resources Conservation Service Soil Survey (See Attached Documentation), this development would have a significant impact. Enclosed is the map showing the Duncan Rezone with a soil classification of 800 (Brysil gravelly ashy loam). This classification by the USDA is considered **Prime Farmland**. This is a quote from and is included in the documentation I received from the USDA: "A recent trend in land use in some areas has been the loss of **prime farmland** to industrial and urban uses. The loss of **prime farmland** to other uses puts pressure on marginal lands". These two statements are in agreement that **prime farmland** should be protected from "development".

2. In the application under "Water": It is stated that the property adjoins "Manastash Creek". No mention is made of the fact that there is a restoration project (Manastash Creek Restoration Project) being done by the Kittitas County Conservation District (KCCD) and other agencies and what impact a housing development would have on its goals.

3. In the application under "Plant": No mention is made to the fact that the riparian area surrounding Manastash Creek is sensitive habitat and that any disturbance could have long lasting effects. No mention is made by the applicant in regards to being proactive in protecting these areas. In addition, the list of the vegetation on the site is much more diverse than just "sagebrush".

4. In the application under "Animals": The response "None to our knowledge", "No", "Does not Apply" shows a lack concern on the applicant's part to provide any form of mitigation for wildlife transit or habitat. Based on the studies KCCD and presented in the Manastash Creek Restoration Project Instream Flow Enhancement Implementation Plan, I quote "Rainbow trout/steelhead of undetermined origin are present within Manastash Creek". The reference for this quote can be found on the KCCD website at:

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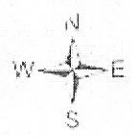
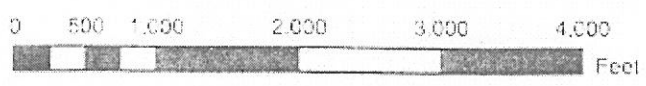
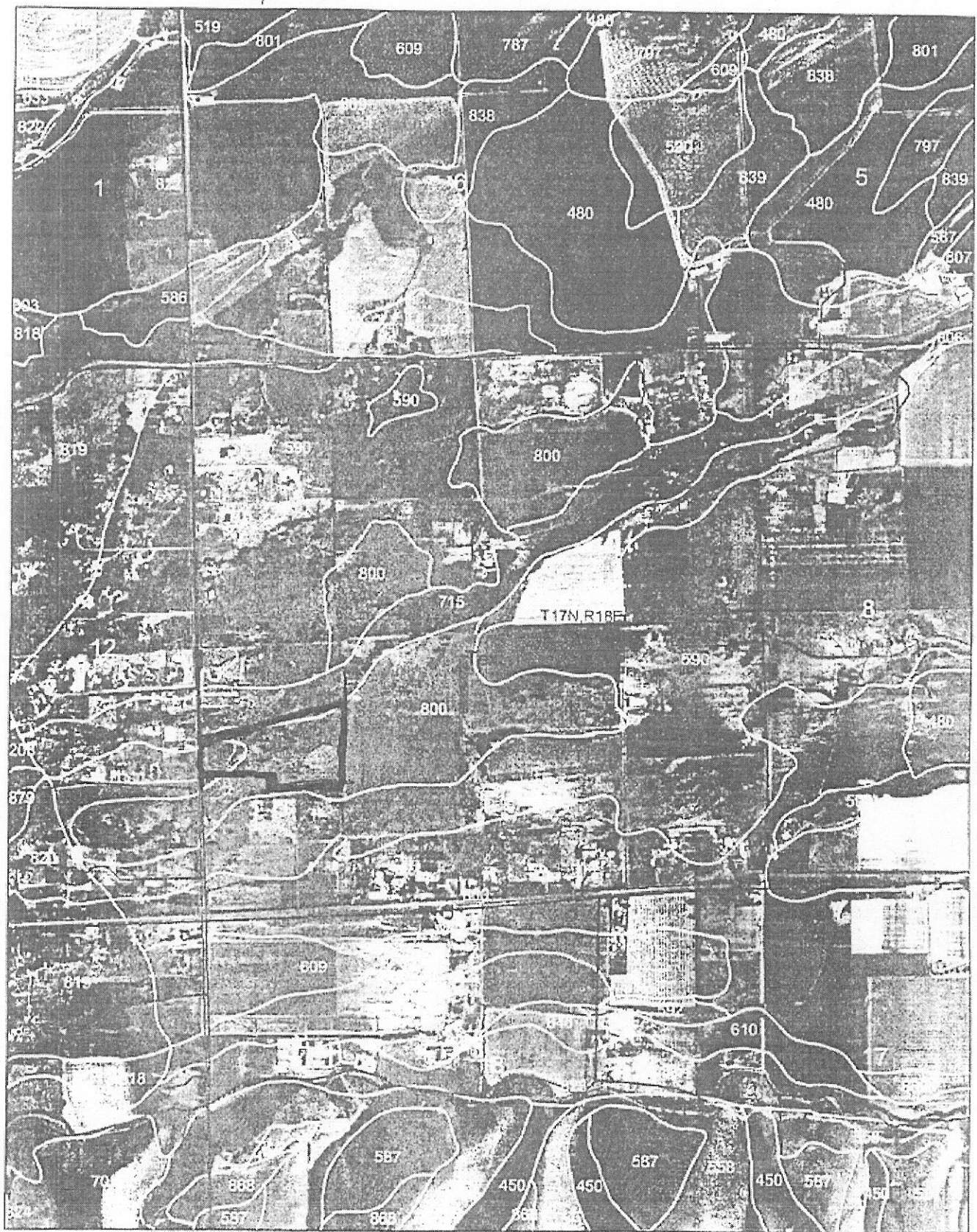
(http://www.kccd.net/Current_Projects/Manastash/Manastash%20Imp%20Plan%2010-30-07.pdf).

Finally, it is obvious the SEPA Environmental checklist is incomplete. I suggest that this proposal is significant under the guidelines of SEPA and an EIS is recommended. At least a site visit before any determination is made.

Thank you for your patience in listening to my concerns.

Soil Survey

S7, T17N, F18E



Map Unit Description (WA)

Kittitas County Area, Washington

800 - Brysill gravelly ashy loam, 2 to 5 percent slopes

Mean annual precipitation: 9 to 12 inches

Frost-free period: 130 to 150 days

Mean annual temperature: 48 to 50 degrees F

Farmland class: Prime farmland

Brysill and similar soils

Extent: about 85 percent of the unit

Landform(s): alluvial fans

Slope gradient: 2 to 5 percent

Parent material: alluvium with an influence of volcanic ash in the surface

Restrictive feature(s): strongly contrasting textural stratification

Seasonal high water table: greater than 60 inches

Flooding frequency: none

Ponding frequency: none

Soil loss tolerance (T factor): 4

Wind erodibility group (WEG): 5

Wind erodibility index (WEI): 56

Land capability subclass, non-irrigated: 6s

Land capability subclass, irrigated: 3s

Drainage class: well drained

Hydric soil class: no

Hydrologic group: B

Representative soil profile:

	Texture	Permeability	Available Water Capacity	af ¹	Kw	Kf
H1 -- 0 to 9 in	gravelly ashy loam	moderate	1.0 to 1.4 in	6.1 to 7.3	.20	.37
H2 -- 9 to 15 in	very gravelly ashy loam	moderate	0.4 to 0.6 in	6.1 to 7.3	.10	.37
H3 -- 15 to 25 in	very gravelly sandy clay loam	moderately slow	0.6 to 1.1 in	6.6 to 7.3	.10	.37
H4 -- 25 to 48 in	extremely gravelly sandy loam	moderate	1.1 to 2.3 in	6.6 to 7.8	.10	.43
H5 -- 48 to 60 in	extremely gravelly loamy sand	rapid	0.4 to 0.5 in	6.6 to 7.6	.05	.47

Ecological Site / Plant Association: DRY LOAMY 9-12 PZ -ARIDIC (R008XY101WA)