August 27, 2020

TO: Kelly Bacon, Designated Permit Coordinator
Kittitas County Community Development Services
411 N. Ruby Street, Suite 2
Ellensburg, WA 98926
kelly.bacon.cd@

FROM: Bob and Cindy Knudson
3702 Caribou Road
Ellensburg, WA 98926

RE: Project File Number, Brown and Jackson, SE-20-00003

Dear Kelly Bacon,

Our written comments submitted are in regard to Washington State Environmental Policy Act (SEPA), Chapter 43.21C RCW, and Kittitas County Grading Permit public notice Brown and Jackson, SE-20-00003, dated, Monday, August 17, 2020. It is of our understanding that Kittitas County is acting as SEPA Lead Agency for the proposed project and proposed SEPA project actions and that Kittitas County is reviewing Brown and Jackson's June 11, 2020 Kittitas County, Department of Public Works, Grading Permit Application. However, based on review of the documents we understand we are commenting on the project as a whole, including, but not limited to, Washington State Department of Ecology's General Permit for Biosolids Management.

The comments contained herein apply to the project as a whole as presented in the public documents provided by Kittitas County on August 17, 2020, see list below. We reserve the right to comment on any and all future proposed changes, additional project actions, amendments and/or mitigation.

Comments related to this proposed action include, but are not expressly limited to the following, based on information provided in Kittitas County's SEPA website, below, accessed on Monday August 24, 2020.

Project Location:

Kittitas County Parcel Number: 295134

Project proponent/applicant: Brown and Jackson, Inc. of Ellensburg, WA

Kittitas County Project Documents Weblink:

https://www.co.kittitas.wa.us/cds/land-use/project-details.aspx?title=Miscellaneous%20SEPA%20Applications&project=SE-20-00003+Brown+%26+Jackson

List of SEPA and project documents available for review:

- 20410_SEPA ADDENDUM_06.30.20.pdf
- GP-20-00010.pdf

- SE-20-00003 Brown & Jackson Receipt.pdf
- SE-20-00003 Brown & Jackson SEPA Checklist.pdf
- SE-20-00003 Brown and Jackson NOA Legal.pdf
- SE-20-00003 Brown and Jackson NOA Memo.pdf

SEPA Checklist and Proposed Action comments:
The following is a list of comments related to the SEPA checklist and available project documents.

A. Background

A.12.: Included Preliminary Site Plan does not appear to locate features, such as streams and irrigation ditches accurately. Included map in the July 30, 2020 Western Pacific Engineering and Survey document improperly characterizes Parke Creek's location with respect to the fields and proposed storage ponds. Parke Creek is the water body flowing from the north to south on the eastern-center portion of the site. The irrigation ditch, locally known as Parke Creek Ditch, flows from the east to the west across the site conveying irrigation and stock water to farms and ranches several miles downstream of the site. Please update maps and labeling.

Corrections to the map are included in Attachment 1.

B. Environmental Elements

B.1.: Earth.

c. Included narrative does not mention that the site's predominant soils include: 1) 674 – Durtash gravelly loam, and 2) 618 – Nitzel ashy silt loam, Attachment 2. Roughly 50% of the site is found within 674, which is noted as containing a restrictive feature 10-20 inches below surface to duripan, otherwise known as caliche or hardpan. Caliche is known to be a confining layer of groundwater flow and can cause groundwater to flow laterally. Leaching of nutrients from the surface application of septage could flow along groundwater flow paths into irrigation ditches and surface water bodies. Please clearly define soil profiles.

USDA Web Soil Service references:

- Attachments 2

https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx

e. It is locally understood that construction of an access bridge across Parke Creek has already occurred. Please clearly describe recent construction.

B.2.: Air

c. How long will soil be left uncovered/exposed before planning a crop? How will a crop be planted in the event that there are no fall rains? Will heavy fall rains cause soil erosion and transportation of septage into surface water bodies? Do you have an irrigation plan and/or water rights?

B.3.A., B. and C.: Water

A.1.: Parke Creek Ditch flows east to west diagonally across the project site. Parke Creek flows north to south across the project site. KRD North Branch Canal immediately abuts the project site to the south. 3 surface water bodies, total. Please update.

A.4.: The application and checklist state water will be used for dust control. Please describe water sources and legal water rights.

A.5.: The checklist state that the site lies in Zone C of the FEMA FIRM and is defined as "minimal flooding". Being that the site is known to flood, how will flooding affect soil-applied septage and storage ponds?

A.6.: The checklist states "No, waste materials are expected to be discharged to surface waters as a result of this proposal." Conflicting statement, please consider revising. Also please consider the potential for waste materials to be discharged to surface water bodies through groundwater movement, especially if irrigation is anticipated to be applied.

B.1.: The checklist states: "This project does not include the additional withdrawal of water from the ground, or the withdrawal of groundwater." However, Section B.2.C. states that water will be used for dust control and Section A.11. states various crops will be grown. Please state how water will be used for both and from what legal source(s). If crops are grown, how will applied

B.2.: "Other sources" should include field/soil application of septage.

C.1. and 2.: Checklist should also account for frequent thunderstorms in the summer that are known create significant rainfall and flash flooding. Additionally, the area can receive substantial snow fall and then melt suddenly in rain-on-snow events. These local weather conditions can exacerbate erosion, especially in uncovered soils.

Additionally, runoff from the site is likely to flow into Parke Creek Ditch, a private irrigation ditch, and the KRD South Branch Canal, a federal and state facility. Runoff can include, but is not limited to:

- Accidental spills from land application into and in the near vicinity of the Parke Creek Ditch or KRD South Branch Canal.
- Surface water runoff into the irrigation ditch either from irrigation water application or storm events.
- Groundwater infiltration and upwelling into the irrigation ditch.
- Runoff into Parke Creek, a fish bearing stream.
- Surface water transportation down irrigation ditches and canals.
    - Expanded impacts to domestic wells as a result of potential irrigation ditch transportation of septage downstream?

C.3.: Construction of roads and tillage could cause impacts to the irrigation ditch by transmitting septage to downstream water right holders, properties and commercial crops.

B.4.: Plants

4.C.: Parke Creek is a fish bearing stream. ESA listed steelhead use downstream of I-90.

B.7.: Environmental Health

A.1.: Spill Response Plan was not included in documents provided by Kittitas County. Unable to review.

B.8.: Land and Shoreline Use

B. Is the land tillable to the depth required for septage treatment? Since the land has not been farmed in the last 30+ years it is possible that any/all state issued water rights have relinquished per Chapter 90.14 RCW.

B.1. Answer provided is incorrect. The Parke Creek Ditch and KRD South Branch Canal are either within or immediately adjacent to the project. Describe how any runoff or over application of septage will directly impact 1,000's of acres of highly valuable farmland and crops.

B.14.: Transportation

F. Will there be additional trucks/traffic during construction? Will there be more traffic during certain times of the year? Is the estimate provided based on traffic following construction and during the course of normal business? How many trips per week during construction and during normal business?

Response/comment in regards to the "Notice of Application", dated Monday, August 17, 2020.

Concerned that the county improperly characterized Brown and Jackson as a Utility under Kittitas County Code (KCC) 17.61. UPDATE USING KRD'S LANGUAGE

We appreciate the opportunity to submit comments on this proposed project.

Respectfully,

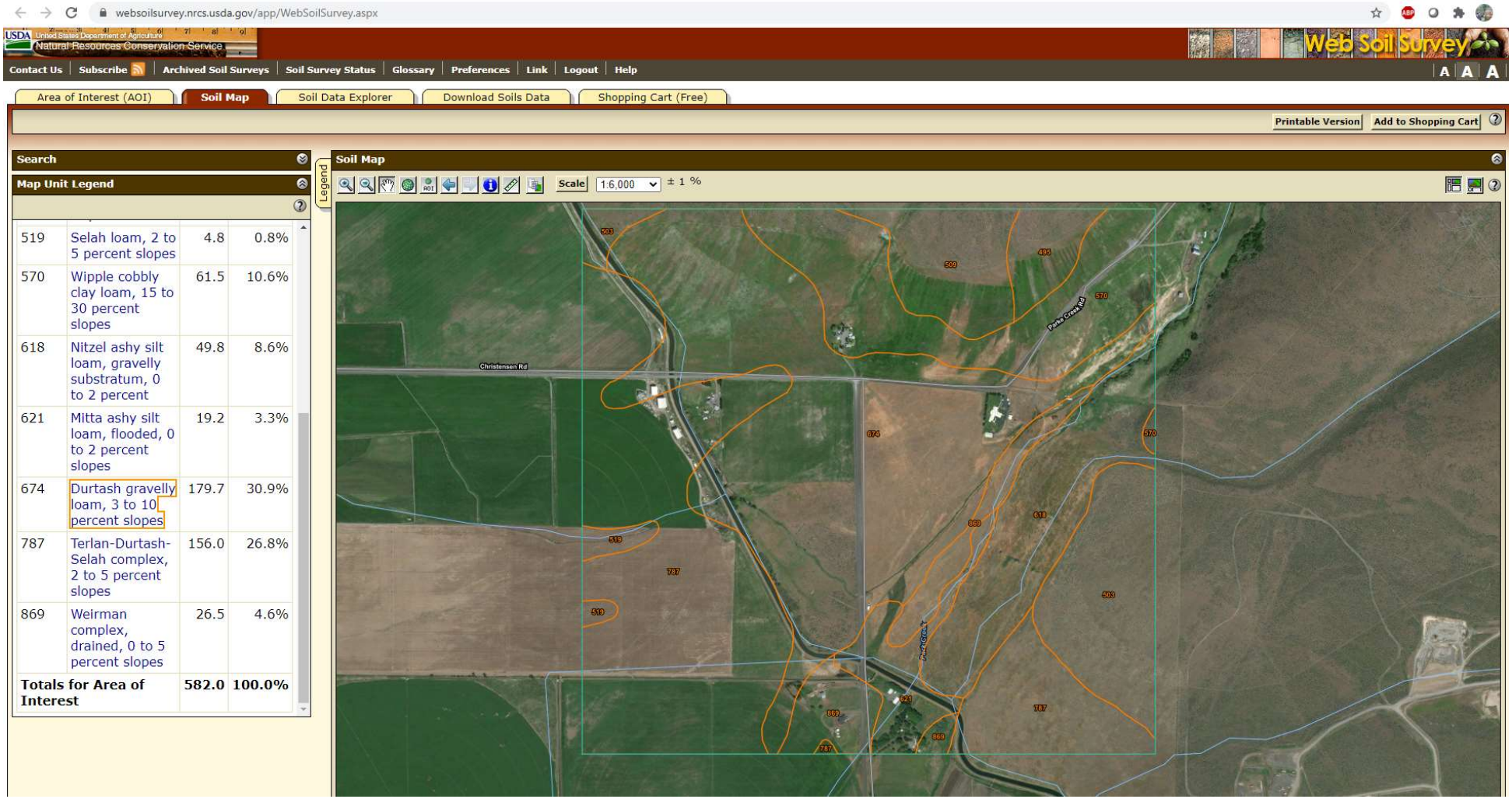
Cindy Knudson

C Knudson

Bob Knudson

Bob Knudson

Attachment 2: Soil Mapping



519	Selah loam, 2 to 5 percent slopes	4.8	0.8%
570	Wipple cobbly clay loam, 15 to 30 percent slopes	61.5	10.6%
618	Nitzel ashy silt loam, gravelly substratum, 0 to 2 percent	49.8	8.6%
621	Mitta ashy silt loam, flooded, 0 to 2 percent slopes	19.2	3.3%
674	Durtash gravelly loam, 3 to 10 percent slopes	179.7	30.9%
787	Terlan-Durtash-Selah complex, 2 to 5 percent slopes	156.0	26.8%
869	Weirman complex, drained, 0 to 5 percent slopes	26.5	4.6%
Totals for Area of Interest		**582.0**	**100.0%**

Kittitas County Area, Washington

618—Nitzel ashy silt loam, gravelly substratum, 0 to 2 percent

Map Unit Setting

National map unit symbol: 2l58
Elevation: 1,500 to 2,000 feet
Mean annual precipitation: 9 to 12 inches
Mean annual air temperature: 48 to 50 degrees F
Frost-free period: 130 to 150 days
Farmland classification: Prime farmland if irrigated

Map Unit Composition

Nitzel, gravelly substratum, and similar soils: 90 percent
Minor components: 10 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Nitzel, Gravelly Substratum

Setting

Landform: Flood plains
Down-slope shape: Concave
Across-slope shape: Concave
Parent material: Alluvium with an influence of volcanic ash in the upper part

Typical profile

H1 - 0 to 8 inches: ashy silt loam
H2 - 8 to 29 inches: ashy loam
H3 - 29 to 46 inches: loam
H4 - 46 to 60 inches: sandy loam

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Moderately well drained
Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high (0.57 to 1.98 in/hr)
Depth to water table: About 29 to 46 inches
Frequency of flooding: OccasionalNone
Frequency of ponding: None
Available water capacity: High (about 10.4 inches)

Interpretive groups

Land capability classification (irrigated): 3w
Land capability classification (nonirrigated): 3w
Hydrologic Soil Group: C
Hydric soil rating: No

Minor Components

Tanaha

Percent of map unit: 5 percent
Hydric soil rating: No

Mitta

Percent of map unit: 5 percent
Hydric soil rating: No

Data Source Information

Soil Survey Area: Kittitas County Area, Washington
Survey Area Data: Version 13, Jun 4, 2020

Kittitas County Area, Washington

674—Durtash gravelly loam, 3 to 10 percent slopes

Map Unit Setting

National map unit symbol: 2l6z
Elevation: 1,500 to 2,500 feet
Mean annual precipitation: 9 to 12 inches
Mean annual air temperature: 48 to 50 degrees F
Frost-free period: 130 to 170 days
Farmland classification: Not prime farmland

Map Unit Composition

Durtash, gravelly, and similar soils: 80 percent
Minor components: 20 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Durtash, Gravelly

Setting

Landform: Alluvial fans
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium with loess in the upper part

Typical profile

H1 - 0 to 5 inches: gravelly loam
H2 - 5 to 14 inches: very gravelly clay loam
H3 - 14 to 19 inches: extremely gravelly clay
H4 - 19 to 29 inches: cemented material
H5 - 29 to 60 inches: cemented material

Properties and qualities

Slope: 3 to 10 percent
Depth to restrictive feature: 10 to 20 inches to duripan
Drainage class: Well drained
Capacity of the most limiting layer to transmit water (Ksat): Low to moderately low (0.01 to 0.06 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 5 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Sodium adsorption ratio, maximum: 1.0
Available water capacity: Very low (about 2.1 inches)

Interpretive groups

Land capability classification (irrigated): 6s
Land capability classification (nonirrigated): 7s
Hydrologic Soil Group: D

Ecological site: R008XY201WA - DRY STONY 10-16 PZ
Hydric soil rating: No

Minor Components

Selah
Percent of map unit: 10 percent
Hydric soil rating: No

Manastash
Percent of map unit: 5 percent
Hydric soil rating: No

Terlan
Percent of map unit: 5 percent
Hydric soil rating: No

Data Source Information

Soil Survey Area: Kittitas County Area, Washington
Survey Area Data: Version 13, Jun 4, 2020

BROWN & JACKSON

Land Application Site

Preliminary

Site Map

Kittitas County Washington

Designed by RBH
Drawn by TNH/RBH
Checked by RBH
Project No. 20102
Date April 2020
Scale: Hor. 1" = 5'
Vert. 1" = N/A
Sec 34, T 18 N, R 20 E

No.	Revision	Date	By

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