



STATE OF WASHINGTON
DEPARTMENT OF CHILDREN, YOUTH, AND FAMILIES
OFFICE OF THE SECRETARY

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September 1, 2020

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Project Name (File No.): Brown and Jackson (SE-20-00003) | DCYF Considerations
Comment Deadline: September 1, 2020 at 5:00 pm

The Department of Children, Youth, and Families (DCYF) has owned and operated the Parke Creek Community Facility at 11042 Parke Creek Road, Ellensburg, WA 98926 for 39 years. Our goal is to provide safe and therapeutic environments for youth from across the state of Washington so they may experience effective rehabilitation and reintegration¹. The Parke Creek Community Facility (PCCF) is a home away from home for young boys ages 12-16 while they serve their sentence and learn positive behaviors while they experience the benefits of the Kittitas community. PCCF provides cognitive behavioral treatment services and an onsite school program for up to 14 youth. The boys reside at the facility an average of 4.5 months. These children utilize the land around PCCF for recreational activities on a daily basis and attend school in a separate building on site. Parke Creek employs 20 staff, many of whom are residents of the surrounding area and student interns from Central Washington University.

¹ As defined by RCW 13.0.010 DCYF Juvenile Rehabilitation services exist in order to:

- Provide for the rehabilitation and reintegration of juvenile offenders;
- (g) Provide necessary treatment, supervision, and custody for juvenile offenders;
- (h) Provide for the handling of juvenile offenders by communities whenever consistent with public safety;
- (i) Provide for restitution to victims of crime;

Additionally, RCW 72.05.130, defines that facilities operated by DCYF are designed as follows:
The department of children, youth, and families shall establish, maintain, operate and administer a comprehensive program for the custody, care, education, treatment, instruction, guidance, control, and rehabilitation of all persons who may be committed or admitted to institutions, schools, or other facilities

DCYF has a responsibility and commitment to provide a positive, clean and healthy physical environment. The placement of the proposed commercial septage and treatment project immediately adjacent to where 14 young boys live is in conflict with the state's responsibility to meet this commitment to these Washington children. Both staff and youth will likely be regularly exposed to both the air and water quality health hazards and constant foul smells if this project would be approved.

The applicant's proposed septage lagoons are planned to be constructed in near proximity to PCCF and would be accessed over a driveway abutting our DCYF property. The only consideration given to our facility is a statement that describes the adjacent land use as follows: "[m]ost of the surrounding area is either vacant or used for agricultural purposes, with the exception of the State DSHS [now DCYF] facility to the north." This indicates a lack of analysis or consideration of any real potential impacts to the young boys who receive rehabilitation services at this facility, and the staff who work there 24/7. In actuality, the property and community facility are *immediately adjacent* to the proposed septage hauling route and within just a few hundred feet east of the proposed septage ponds. It does not appear any meaningful consideration has been given to the proximity to and impact on DCYF's residential facility. Further analysis of the potential impacts should be required.

DCYF has significant concerns as to the approval for this type of commercial non-utility operation near the Parke Creek community facility without sufficient evaluation of whether it is an authorized use. The proposed commercial septage and treatment works appears to be incompatible with the rural agricultural zoning. It also does not appear to be a utility as would be commonly understood. The Notice of Application describes the proposal as including the "construction of two storage ponds to hold septage" that the applicant pumps "from a variety of commercial and residential sources." DCYF questions whether the proposed septage ponds and associated land application is a "utility" under the zoning code.

Commercial operations and wastewater treatment of the type put forward here require significantly more scrutiny than what is being proposed.

DCYF is further concerned that the potential environmental impacts and human health and safety concerns have not been properly disclosed or analyzed. Various surface water bodies, including Parke Creek, flow through or in the vicinity of the DCYF property and between it and the proposed septage ponds. The potential water quality impacts of the proposed project on these water courses do not appear to have not been adequately characterized or addressed. The PCCF staff regularly note the constant wind, which makes more odor concern. PCCF also sits at a high ground point but they have experienced water run off during the spring. The seasonal spring runs across PCCF property. The area also has a high water table and PCCF's well could be impacted by the proposed septage ponds, as it is below them.

DCYF requests further and more specific analysis of the potential for aerosolization of septage from the ponds and land application, and related odor impacts, given the very close proximity of PCCF.

As proposed, DCYF does not support the proposed land use application or issuance of an MDNS, and requests the proposal be denied. At a minimum, further consideration of the land use authorization and environmental impacts should be more thoroughly addressed.

If you have additional questions feel free to contact Ken Moses, Director, DCYF Capital Operations, Facilities and Institution Business Services @ ken.moses@dcyf.wa.gov.

Regards,



Frank Ordway
Chief of Staff

cc: Rebecca Kelly, Acting Assistant Secretary, DCYF Juvenile Rehabilitation
Kathleen Harvey, Director of Community, Reentry, and Parole Programs DCYF Juvenile Rehabilitation
Lori Keshl, Regional Administrator, DCYF Juvenile Rehabilitation Regions 1-3
Ken Moses, DCYF Capital Operations, Facilities and Institution Business Services