



## Kittitas Reclamation District

P.O. Box 276

Ellensburg, WA 98926

Phone: (509) 925-6158 Fax: (509) 925-7425

September 1, 2020

Kelly Bacon  
Designated Permit Coordinator  
Kittitas County Community Development Services  
411 N. Ruby Street, Ste. 2  
Ellensburg, WA 98926

RE: Project File No. SE-20-00003 (Brown and Jackson)  
Kittitas Reclamation District Comments

Ms. Bacon:

The Kittitas Reclamation District (KRD) has reviewed the subject proposal and finds the provided analysis of potential environmental impacts severely lacking. The scope and magnitude of potential impacts to the environment, KRD infrastructure, and downstream irrigators has not been analyzed. Without this information, it is not possible for Kittitas County to determine all environmental consequences of the action and therefore a threshold determination under SEPA cannot in good faith be issued.

KRD provides water for irrigation to the Kittitas Valley. KRD supplies irrigation water to two-thirds of all the irrigated acres in Kittitas County totaling almost 60,000 acres. KRD's North Branch Canal which is adjacent to and down-gradient of the proposed septage operations provides irrigation water to 19,992 assessed acres. Approximately 2,171 acres served by this canal are producing high value specialty crops that include apples, pears, cherries, blueberries, grapes and others with an investment in these acres alone estimated to be at over \$100,000,000. The majority of the remainder of the acreage in the area downstream of the proposed septage site is producing high quality Timothy and Alfalfa hay that is processed and exported throughout the world. The risks associated with potential septage impacts to the KRD canal through various potential pathways raises significant public health and safety concerns that need to be adequately evaluated.

Further, KRD, in partnership with the Department of Ecology, U.S. Bureau of Reclamation (USBR), the Yakama Nation, and other basin stakeholders, is committed to ensuring that, among other things, critical fish habitat and water quality are adequately protected in the Yakima river basin as part of the Yakima Basin Integrated Plan (Integrated Plan). Of concern, KRD is wheeling a significant amount of water through the KRD North Branch Canal and returning it directly back to the Yakima River for Yakima project purposes just downstream of

the proposed septage site. In total, KRD sends up to 169 cfs from the North Branch Canal back to the Yakima River downstream of the proposed septage site through the Wipple Wasteway, the Billeter Wasteway that then leads to the Wipple Wasteway, and the Turbine Ditch located at the Yakima River at the end of the Turbine Lateral. Wipple Wasteway is also referred to as Badger Creek and is regularly used by coho salmon, anadromous steelhead (*Oncorhynchus mykiss*), and other species.

Specific to the proposal, KRD does not believe the proposed commercial septage site to be an authorized use in the agricultural zone. KRD suggests that continued delivery of the collected septage to the Kittitas County landfill, where the septage can be properly received, managed, and treated, provides greater assurance to the public of proper management. Alternatively, KRD suggests that an alternate site should be pursued. A septage management facility and associated wastewater treatment is inconsistent with the primary agricultural use in this part of the County. As KRD addresses under separate cover, the proposed commercial septage site is not a “utility” and as such, is not an allowed use.

The project proponent has further not adequately identified the potential impacts to the environment. Without limitation, several of the notable deficiencies are outlined by reference to the respective SEPA Checklist section below:

### **Section B.1 (Environmental Elements – Earth)**

Section B.1.f. – This section does not provide adequate detail regarding the potential for erosion during operation and use of the site. Analysis of land application methods, locations, and timing and the risk of erosion impacting natural waterways and the KRD North Branch Canal need to be provided. The adjacent section of the North Branch Canal is not protected from surface flows.

### **Section B.2 (Environmental Elements – Air)**

Section B.2.a and B.2.c – No analysis is provided regarding the wind-borne transmission of particulates during land application and disking activities. This part of the valley is subject to elevated down-slope winds. There is high likelihood that airborne contaminants will travel large distances. There are a very limited number of days that the wind is blowing less than 4 mph, at which volatilization of contaminants begins to occur even on areas that have been disked. There is no analysis of such wind patterns nor the potential impact to water quality from airborne transmission of contaminants.

### **Section B.3 (Environmental Elements – Water)**

Section B.3.a.1 – This section and the included site map do not accurately describe all of the surface water features, such as streams and irrigation ditches. The site map included in the July 30, 2020 Western Pacific Engineering and Survey addendum improperly characterizes

Parke Creek's location with respect to the application fields and proposed storage ponds. There are three waterways that bisect the proposed project site, and each of them undershoot the KRD canal. The checklist fails to identify all of the surface water features, describe the type, or state what stream or river it flows to. At least two of the surface water features are in close proximity to the proposed septage ponds.

Section B.3.a.1 – National Wetlands Inventory maps a palustrine emergent wetland on the site. This wetland is not identified or considered in the proposal. There is no information or analysis regarding potential impacts to this wetland or its buffer, or the presence of other wetlands on the site. This wetland and associated critical area is further omitted from and not identified in the Grading Permit Application request for identification of critical areas.

Section B.3.a.2 – The Proposal indicates all planned work is located more than 200 feet from nearby waterways. However, the site map provided in the addendum shows potential application area as occurring within 100 feet of the Parke Creek seasonal channel and the KRD North Branch canal, which is down-gradient of the proposed use area. Potential impacts to all surface water and the unlined canal after land application are not covered. There is no analysis of the potential for surface water contamination and transfer to the KRD canal.

Section B.3.a.5 – Nearby property owners have observed flooding on the parcel. Further analysis is required regarding the potential impact of flooding on soil-applied septage and the septage ponds, and impact to adjacent properties, including the KRD canal.

Section B.3.a.6 – No analysis is provided regarding runoff and sheet flow occasioned by snow melt events, rain on snow, or high rain events or the wind-borne transmission of aerosolized particulates during land application and disking activities and their associated impacts on surface water and the KRD North Branch Canal. Between the anticipated and known projected weather events (high winds, heavy rainfall, snow, rain on snow, and others) land application of septage could be prohibitive or severely restricted.

Section B.3.b.2 – Infiltration and potential impacts to groundwater after land application are not covered. NRCS Soil Maps indicate the presence of restrictive layers, which may impact groundwater flow in the area. The KRD North Branch Canal is down-gradient of the proposed use area. The canal in this location is unlined and co-mingles with groundwater. There is no analysis of the potential for groundwater contamination and transfer to the KRD canal.

Section B.3.c.1 and 3.c.2 – Stating average rainfall per year does not provide adequate justification for infiltration. All surface waters that bisect the site can experience out-of-bank flows in this location. When flows are out of bank, the KRD North Branch Canal is the receiving waterbody. The statement that discharge to surface or groundwater is “not expected to occur” does not provide the analysis required to determine likelihood and impacts from runoff events potentially entering and contaminating the canal.

Section B.3.d – This section merely describes the proposed project. It does not indicate sufficient or any measures for the protection of surface and groundwater impacts.

### **Section B.5 (Environmental Elements – Animals)**

Section B.5 – This area is critical late summer and winter range for elk, which are not identified as occurring on the site. The Parke Creek area in general and this site in specific are regularly used by concentrations of elk. The Colockum elk herd is regularly hunted by members of the public from inside and outside the County, with many animals harvested each year and used for human consumption. Per EPA and Department of Ecology regulations, no domestic grazing is allowed within 30 days of septage application. The proposal does not provide any analysis of the potential for use and grazing by elk and the potential human health risks.

### **Section B.7 (Environmental Elements – Environmental Health)**

Section B.7 – This section does not adequately describe the potential for impacts to aquatic resources, including the KRD North Branch Canal. Moreover, this section does not describe or consider at all the potential for impacts to food crops and human health associated with the fruit and vegetable crops that rely on and use irrigation water in the KRD North Branch Canal downstream of the project site. There are severe and significant consequences to contaminated water used for irrigation. There are high-value food crops that utilize KRD irrigation water, and the potential for human impacts and consequences is not addressed. For example, Ecology regulations place significant timing limitations on the harvesting of food crops after application of biosolids, ranging in time from 30 days to 38 months.

Section B.7. – This section also does not disclose or indicate any analysis of vector attraction. Vector attraction is the characteristic of biosolids or septage that attracts rodents, flies, mosquitoes, or other organisms capable of transporting infectious agents. No disclosure or analysis of any vector attraction methods are included. The applicant has further not demonstrated how it will prevent the subsequent transfer of pollutants into the immediately adjacent waterways, including the KRD North Branch Canal.

### **Section B.8 (Environmental Elements – Land and Shoreline Use)**

Section B.8 – This section does not adequately describe the potential for impacts to current land uses on nearby and adjacent properties, including without limitation, the KRD North Branch Canal and the downstream properties to which the canal delivers irrigation water. There are severe and significant consequences to contaminated water used for irrigation. There are high-value food crops that utilize KRD irrigation water, and the potential for human health impacts and consequences is not addressed.

Section B.8.h. – The critical areas (wetlands) on the property are not identified or considered.

**Section B.13 (Environmental Elements – Historic and cultural preservation)**

Section B.13.c – The potential impacts to cultural and historical resources are not adequately addressed. This area has a high likelihood of pre-contact archaeological findings. The analysis even indicates DAHP highly recommends an archaeological study be conducted. Relying on a WISAARD database search returning no record results is not adequate due diligence to determine the nature and scope of potential cultural resource impacts. This only determines no studies have occurred in the area. The National Historic Preservation Act requires project-specific review and analysis of potential impacts.

KRD reiterates its concern regarding the risk of significant harm in the event septage were to negatively impact the KRD North Branch Canal. As the County is certainly aware, a 2018 sewer leak in the Terrace Heights Sewer District in Yakima County contaminated the irrigation water conveyed by the Roza Irrigation District, which led to significant health and safety concerns, and crop and economic loss. It does not appear the risk this project poses to the KRD canal has been sufficiently evaluated.

Thank you for your consideration of these comments. KRD is committed to protecting the water we provide to our users for irrigation and to the streams as part of our supplementation activities. As the County has not yet issued a threshold determination, KRD reserves the right to provide further and additional comments as to any threshold determination under SEPA. KRD requests notice of any decision on the application, including any threshold determination under SEPA and any and all permit decisions associated with the proposed project.

Sincerely,



Urban Eberhart  
Secretary / Manager