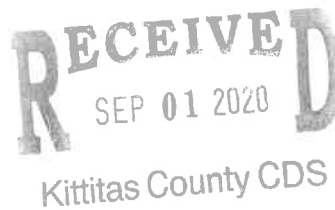


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September 1, 2020

Kelly Bacon  
Designated Permit Coordinator  
Kittitas County  
Washington State

RE: SE-20-00003 Brown & Jackson

Ms. Bacon and whom else's desk it may fall upon,

I am opposed to the Brown and Jackson septage pond project – should be septage lagoon project but for continuity we'll use pond. In an Agricultural zone, how can commercial septage storage ponds even be considered agricultural? Who in the Community Development Services Department (CDS) thought this project did not warrant public comment and a conditional use permit? It appears to be flying under the radar and hush hush to push it along. My children and I spend HOURS outside every day caring for our livestock and letting the kids be kids. So let me reiterate that I am opposed to the project. After working around septage lagoons I know how it affects outdoor activities and could affect the health of members in the community. A few of the key points are outlined below for the area and the State Environmentals Policy Act (SEPA).

First off having septage stored at the base of a watershed can easily lead to ground water contamination. I know of a storage pond that leaked for 10 years and on a whim the staff found tears. The company performing the initial construction made huge holes and dozer tracks were visible in the liner. The company covered it up like nothing happened between inspections on the project. Yes they had wells for testing to check for leaks and those tests came back in the 'normal' range. However the pond was leaking thorough the second liner too so it did not pool in the designated holding area that the testing is done in. Luckily the site has a solid rock layer between the ponds and any ground water to prevent the leakage from reaching any aquifers. Can you imagine contaminating the water (aquifer) of all the residents in this area, the streams, and the fallout from it? Erin Brockovich comes to mind.

Next, at the base of a canyon? Air movement comes down the canyon and will go directly over the ponds to all of the homes in the surrounding area. This will keep raw human poo particles in the air with no escape. Can you imagine enjoying a quiet evening outside when the air smells like human shit? Literally. If you have any doubts about smell go up to the county's Ryegrass Landfill when Brown and Jackson dump's a tank. The smell hangs around for days even with a breeze at the top of a hill. Brown and Jackson dumps at least one load a day resulting in a constant release of particles into the air. They also claim they will have 1-2 trucks dumping 1-2 times a day with the max being 8 times a day. At the max that is about 28,000 gallons so for an average we will say 14,000 gallons/day. Under the SEPA Section 2: Air. How can they state septage has no odor? With

that much septage going in to the ponds there will be an odor. Anaerobic concentrated septage mixing with an aerobic environment will result in off gassing, microbe byproducts, and microbe decay. Along with wind comes litter. We all know things get thrown in the port-a-potty and go down the drain that shouldn't be there. From my experience working at a septage lagoon the required 3/8" bar screen does not collect all debris. If you have any doubts please go to Ryegrass and see for yourself. How does Brown and Jackson plan to contain the unwanted debris and litter?

Again water. This location is in a non-surveyed floodplain and has three Department of Natural Resource (DNR) type 2 streams in it – look it up on COMPAS, it is a beautiful program. How can CDS overlook this fact?! At the very least the FEMA floodplain survey needs to be done for the entire area. Flooding cannot just stop at the Vantage HWY. Putting the ponds at the base of the hill can cause snow run off and heavy rains to damage the area around the pond. In the SEPA they mention the site is rolling and according to the diagram they plan to dig into part of the hillside. The soil in this area is caliche soil. Caliche plus water equals a slick unstable mess – regardless if the ground is flat or has a slope. If they dig into the hillside it will cause their no 'observation or indication of any unstable slope' to become potentially volatile. Even with top soil added it takes away from the naturally forming hill structure which does change and erode with natural spring melt off. While the area only receives 9 inches of precipitation it comes in the form of snow and melts at once. Neighbors of this property mention that this area has seasonal floods when the snow melts. According to COMPAS the proposed site has a designated wetland on it in one of their application fields. I included a photo from COMPAS for ease of reference. According to the diagram submitted there are two creek crossings. Observing the land from the entrance only one bridge is visible. What happened to the first crossing? Was it an existing culvert? If not, how does this modification affect natural water flow? The bridge across the larger creek is brand new. How does that affect the existing creek? According to the SEPA the bridge was labeled 'existing creek crossing' but the visible bridge is brand new. What is its weight rating? Was it inspected? Were the abutments inspected? What modifications did they make to the creek for this larger bridge? Under Section 3: Water, Sub category c. part 3) they answered incorrectly stating, 'none known' when asked if the project will alter or affect drainage patterns. Implying they don't know the site or what they are talking about. The diagram shows they are digging into the hillside for the ponds which will affect the current natural flow of melt off.



Location, location, location. Rather than buying a piece of ground 7 miles from an existing suitable dump site for \$400,000 they should have built ponds at 4771 Tjossem Road. There are far less homes/residents on adjusted lots, it is flat, and there are fewer homes in 2 miles than the Parke Creek site. The ground along Parke Creek has frequent wild elk herds, three streams, several wild bird species, other ground animals, and Killdeer birds. While Killdeer birds are not endangered, their numbers are dropping, and they are protected by the Migratory Bird Treaty Act (MBTA) in the United States. So to say no wild life is present is a bold

faced lie. Just look around and see the property year round. Again, Ryegrass Landfill is only 7 miles east of the Parke Creek site. Brown and Jackson wants to use the ponds for only the greater Ellensburg and Kittitas area. Does that mean when they service the greater Cle Elum area, Thorp area, and any areas outside the Ellensburg and Kittitas areas they will be hauling that up to Ryegrass? Doesn't make sense. Brown and Jackson also states they service Yakima and Naches. Where do they dump it? Will they bring it to Parke Creek or Ryegrass or somewhere else? To my understanding they are required to dump waste in the county of origin so bringing waste from those areas to dump in these Parke Creek ponds would be illegal.

Speaking of county. Has anyone talked to Public Works about how much traffic Parke Creek Road can sustain to that site? We see how heavy trucks damage Vantage Highway. Brown and Jackson trucks/drivers do not drive slowly nor care about slowing down for corners. Look at the damage done to the Ryegrass Landfill road, especially into and out of the pond site. For their proposed site do they plan to use the existing rock road way or build a proper foundation road to the pond? The existing gravel road when wet will likely create mud and upon exiting the site will leave mud tracks and clumps. According to Department of Ecology (DOE) the track out from the tires would need to be cleaned up.

Let's talk about the land and surrounding properties for a moment to get nit-picky. Yes, the ground they own is pasture and vacant. The surrounding properties have houses on them. It is obvious when driving to or from the site from any direction unless your eyes are closed. The Department of Social and Health Services (DSHS) home is directly to the WEST of the site not the north (Section 8: Land and Shoreline Use, Subcategory a.) The zoning is Agriculture 20 and by definition storing human poop is not Agricultural. Under Recreation they state none in the area. Perhaps they don't realize people from all around the county access the hills via Parke Creek Road. When asked if it will impact recreation they stated no. Who wants to go up in the hills when they smell like human poop? Out of respect for the land, its heritage, and recommendation an archaeological survey should be performed.

In regards to the project verbiage there are some important definitions:

Sewage – waste water and excrement conveyed in sewers.

Sewage Sludge – refers to the solids separated during the treatment of wastewater.

Septage – the liquid and solid material pumped from a septic tank, cesspool, or other primary treatment source. Liquid accumulates on the surface while the septage sludge settles at the bottom.

Biosolids - refers to treated sewage sludge that meets the EPA pollutant and pathogen requirements for land application and surface disposal.

Utility – an organization supplying the community with electricity, gas, water, or sewerage. Note: NOT Septage.

Lagoon – pond like body of water or basin designed to receive, hold, and treat wastewater for a predetermined period of time.

If they cannot keep these terms straight on a SEPA application how can they understand the full extent of maintaining a septage pond, treating it properly, land applying it safely, mitigating dust

from land application, controlling dust while plowing it into the field, and reporting properly. Do they understand that the dry time of year, summer, makes the ground suitable to drive on? Which is also the time of year they rent out the pasture? Meaning they can't apply during fall, winter, or spring, and for 30 days they cannot rent out the ground to a cattle rancher. How can we trust that they will follow those guidelines to protect the residents when they land apply one time per year? Just like the brand new bridge that was an 'existing creek crossing.' Another worry about their SEPA is they state no utilities are on site. Well there is a power line to the property and appears to be a well. They state they won't use water. Tyler's biggest complaint about the county site is that there is no water. So if a drill rig shows up at the Parke Creek site you bet it will be noticed. The SEPA mentions aerating the pond but not using electricity or power. Are they going to stir it by hand? Let it sit until full? It doesn't seem like they thought through that aspect.

Looking through the SEPA I had some questions and was surprised by their answers. The county should have just as many questions for them and require more information about the sections on the SEPA given the product Brown and Jackson is trying to store and for the wellbeing of the residents of the county.

Should the county decide to approve the project and forego the input of the affected residents please consider some contingencies to their project moving forward.

1. Construction cannot take place until Risk Mapping, Assessment, and Planning are done to assess flood zones.
2. Require financial assurance from Brown and Jackson and their associates or contracted companies during the project should a release or leaking pond be found resulting in but not limited to contaminated ground water, personal wells, waterways, and surrounding land. There is a large financial burden should a cleanup be required. How can we ensure Brown and Jackson won't fold up and walk away leaving the county to deal with the mess?
3. Limit the quantity they can put in for 3 years – say 250,000 gallons. Allowing them time to fully grasp and learn the process of the task they agreed to perform and at the level required to keep residents safe. This refers to but is not limited to treating septage sludge, controlling odor, controlling fugitive dust, containing litter, and any unexpected aspects of treating and managing human waste.
4. Ponds must be tested and inspected yearly by a 3<sup>rd</sup> party after each land application to monitor its integrity and safety for the residents and streams.

For the benefit of the county residents in this area please keep the septage 7 miles up the road with a minimal/non-existent impact to residents.

Sincerely, another local resident trying to keep other people's waste out of my back yard.



Karlin Ekberg