

From: shkwavrydr@aol.com
To: [Kelly Bacon \(CD\)](#)
Subject: Brown and Jackson Septage Lagoon SEPA Determination
Date: Monday, August 31, 2020 9:41:51 PM

Dear Kelly,

There are significant questions about the SEPA Checklist submitted by Brown and Jackson for this proposal.

The proposed action is represented as a solid waste handling facility. The presence of lagoons and nature of the proposed wastes, particularly the high liquid content suggests that it is instead a privately owned sewage treatment facility and should be permitted as such. While the handling of sewage sludge solids at POTWs (Publicly Owned Treatment Works) is considered a solid waste facility within the larger facility, the overall activity is sewage treatment, as is the case with this proposal.

Septic pumpage is often required to be discharged into POTWs, though sometimes metering is required to prevent plant upset due to chemicals present in "sani-cans", RV blackwater dump stations etc., present in addition to sewage waste solids and liquids.

The "seasonal drainage" identified in site plans is also a water of the state. In limnological terms, these are termed "seasonal", "vernal" or "temporary" streams, and fall into the definition of "waters of the state" under RCW 90.48. Thus, whether or not this area is identified on County Shoreline maps as a shoreline, the proximity to this drainage may not meet offset requirements from waters of the State.

Groundwater is also a "water of the State". The proposed use of the site involves "land application" of liquid wastes, which should be regulated under a State Waste Discharge Permit by the Department of Ecology, with appropriate documentation of wastewater composition and groundwater monitoring, as well as potential surface water monitoring when surface flow is present in the "seasonal drainage" adjacent to the lagoons and land application areas where liquids are applied, as well as to assess the impacts of land application of sewage sludge solids on the shallow groundwater in the Kittitas Valley in general, and this area in close proximity to the Yakima River, Parke Creek and the irrigation return ditch west of the proposed site..

The lagoons are likely to be an attractive nuisance in that they are likely to be attractive to waterfowl and shorebirds, as well as land animals if access is not restricted. This issue should be addressed in operational plans if the project proceeds.

The SEPA Determination of the County should be reconsidered. The aggregate potential risks rise to the level that an Environmental Impact Statement should be required of this project, as there is a significant risk of significant adverse environmental impacts.

Sincerely, Norm Peck

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