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Ellensburg, WA 98926

Mr. Cory Wright
Kittitas County Board of Commissioners
205 W 5th Ave. Ste. 108
Ellensburg WA 98926-2887

Dear Mr. Wright:

As a resident of the Parke Creek area for thirty years along with my husband and family, it has come to my attention that Brown & Jackson, Inc. has plans of building and operating two septage ponds at the mouth of Parke Creek Canyon. After perusing the SEPA Application, the Addendum, and the Grading Permit, there are some aspects of this plan that I would like to address.

2. Air

a: The SEPA Checklist asks if there will be emissions from the proposal during construction or maintenance. The answer includes, "Additionally, the stored septage can give an odor." This is one of the greatest understatements I have ever heard or read. When our children were young, the Brown Boys operated their silage pit about a mile up the Vantage Highway from us, and we can tell you that at times the smell was overwhelming. We are down-wind of Parke Creek and do not want to live with the stench of sewage for years to come, nor do the people who live much closer than we do. As the answer is stated in 8. a. Land and Shoreline use, "Most of the surrounding area is vacant or used for agricultural purposes, with the exception of the DSHS facility to the north." The proximity of the Parke Creek Community Facility is indeed directly adjacent to the proposed septage pond site; however, the land in the area is hardly vacant. There are many homes up and down Parke Creek, Fox Road, and the Vantage Highway. It has grown considerably since we moved here in 1989. According to the Kittitas Comprehensive Plan of 2019, the rural areas of the county are supposed to grow from 17,043 to 25,197 by 2037 (pg. 11). With the smell of the septage ponds wafting through the air, no one will want to move out here. It would destroy our property's value as well as the other owners' property values.

3. Water

b.1) Ground Water: The Checklist states that during construction there will be dust mitigation using water suppression (1. Air, c.) but in this section about ground water use, there is no mention of the use of ground water for this purpose. If they pump water for dust mitigation in the construction phase as well as when they apply the biosolids to the cropland (occurring in the driest part of the year), it could adversely affect other irrigators using the same aquifer. Another method of mitigating the smell from the septage is to wash the trucks and truck tanks down at the end of the day, which will require more water. This would also require holding tanks for the wastewater (EPA: Guide to Septage Treatment and Disposal, Chapter 12, pg. 41).

c. Water Runoff (including storm water)

2) The plan states that there should be no expected runoff of waste materials into the ground or surface water. However, if a leak occurs in the lining of one or both of the ponds, the effluent will run down or be absorbed into the creek bed due to their location 10 feet above the lowest point. If the leak goes undetected for a protracted period of time, the effluent will enter the ground water, which could contaminate well water for people in the area who depend on their wells for drinking water. It could also adversely affect people's fields that are irrigated by water from the creek and the ground water that people pump from their wells for irrigation.

In c. 1) The statement that, "This area receives less than 9" of rainfall per year, therefore storm water will infiltrate naturally" does not take into account that Parke Creek has been known to flood in the winter or spring with runoff from the snow in the mountains. This is not an occurrence that happens very often; however, if there is ever an overtopping, a leak or other malfunction of the lagoons, it could be a very serious situation for all who are downstream.

4. Animals

The only animals or birds that have been listed in the Checklist are hawks and deer which are definitely present in the area. But to add to the list, there are other birds and animals who live near and pass through the creek bed such as bald eagles, songbirds, herons, and kestrels, as well as elk, cougar, coyotes, and badgers.

7. Environmental Health

a. The plan directs the reader back to the Spill Response Plan in several of the questions which is not attached to the SEPA Checklist or any other documents with public access. In my opinion for transparency's sake it should be made accessible. Another application that should be made accessible in the interest of transparency is the Department of Ecology's General Biosolids Permit filed by Brown & Jackson.

3) & 5) I am assuming that methods for testing the ph level of the biosolids and land application procedures are detailed in the General Permit Application. There are quite a few considerations when growing food crops on this type of treated soil, and there should be a means by which the state and the public know that these procedures are being followed and reported to the proper agencies for the health of everyone.

8. Land & Shoreline Use

e. The zoning for the site of the septage lagoons is reiterated which is quoted here:

17.29.010 Purpose and intent.

The agriculture (A-20) zone is an area wherein farming, ranching and rural life styles are dominant characteristics. The intent of this zoning classification is to preserve fertile farmland from encroachment by nonagricultural land uses; and protect the rights and traditions of those engaged in agriculture. ([Ord. 2013-008](#), 2013; Ord. 83-Z-2 (part), 1983; Res. 83-10, 1983)

Even though sewage is allowed under the zoning codes for A-20, I suggest that septage lagoons do not fit the spirit of this ordinance and that the purpose which Brown & Jackson is pursuing is that of a nonagricultural, commercial use.

This quote from the Kittitas County Comprehensive Plan, 2019 expands upon maintaining the rural character of the county:

8.4.2 Planning for Rural Lands

The Rural and Resource element is intended to preserve rural character through adopted goals and policies designed to encourage and protect the types of uses that are characteristic to the rural area. The goals and policies are intended to accomplish this in part by reducing conflicting land uses within the County's rural area while providing a variety of rural densities, protecting agriculture land resources and activities, guarding the County's water resources and insuring appropriate services and facilities for such environments (pg. 87).

In the spirit of “reducing conflicting land uses within the county’s rural area[s],” I must wholeheartedly condemn this septage project as not being within the county’s plan for preserving rural lifestyles and the health and well-being of our rural residents in the Parke Creek area and beyond. There is already a county solid waste facility to which Brown and Jackson hauls their septage, which is away from residents and where the waste is monitored and reported on by county employees. I understand that they want to save money and cut their costs for currently using this operating model, and I cannot fault a person for wanting to expand his or her business. However, I cannot condone expanding it at the expense of the health and goodwill of that business’ neighbors.

It seems that Brown & Jackson’s interests lie in making the quickest dollar, with the minimum permit requirements, and at the lowest cost. Kittitas County has seen poor development land use, especially with the noncompliance of the Growth Management Act for several years in the 2000’s and early 2010’s. This permit would be a noncompliance of the GMA, and once again, if shuffled through the permitting system for meeting the “minimum requirements,” the residents will end up paying for the costs of these impacts for many years to come. The business and developer will again get off the hook for degrading the current conditions. We must think about the impacts for years to come outside of the lens of meeting minimum requirements, taking into consideration the Land Use and Building Analysis Capacity Memo (Berk Consulting 2016), and other planning forecasts. These studies show the demand on natural resources and land will be more taxed with a growing population and adding sewage ponds to the mix create another component of complexity. This project will ultimately degrade the quality of life for flora and fauna and the residents of the Parke Creek area who want their slice of heaven with clean air and clean water.

The residents and neighbors of Parke Creek area urge Kittitas County Community Development Services to deny this application due to insufficient information and not meeting the intent of Kittitas County Code 17A and the Kittitas County Comprehensive Plan.

Thank you for your consideration,

Sylvia L. Shriner

