

May 26th, 2023

Kelly Bacon
Planner 1
Kittitas County Community Development Services
411 North Ruby Street, Ste 2
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Re: Addendum #1 to 3-8-2023 Letter of Concern regarding Conditional Use Application CU-23-00001, [CU-23-00001 - 3 BR Custom Cuts - Comments Matthew Vaughan, Arrienne & Shannon Bright 3-8-23](#)

Our concerns listed below are in addition to the concerns outlined in our 3-8-2028 letter.

Concerns regarding **17.60A.015 Review criteria:**

Though the concept of a meat processing facility in Kittitas County is potentially desirable for our ranching community the site is inappropriate and potentially “detrimental or injurious to the public health, peace, [...and] safety [...] and to the character of the surrounding neighborhood.”

The proposed site may not be “unreasonably detrimental to the economic welfare of the county...” at large but it will certainly be economically detrimental to the market value and marketability of all the properties near it.

The high groundwater and seasonal flooding experienced earlier this month demonstrate that:

- A standard septic system will pose a probable threat of contamination to the ground water, aquifer, and Lyle Creek which is a Type F (fish bearing) stream.
- The most recent Project Narrative, SEPA Checklist, and Water, Offal & Indelible Product Mitigation Plan for CU-23-00001 in no way assure that this domestic sewage/septic system will not contaminate the groundwater, fish habitat in Lyle Creek, the aquifer, and nearby wells.
- The 37,100-sf buildout—as depicted in the most recent site plan is concentrated in the western 400’ of the parcel—the concentration means it is likely to impact the high ground water, diverting water to properties nearby and result in more seasonal flooding and potential contamination.
- Any seasonal flooding will surely flow downslope into Lyle Creek and potentially contaminate the stream at a time when any fish are likely to be most vulnerable.

Earlier this month the high ground water was clearly visible on the site in the trench in the middle of the site and near the well head, and in the ditch on east side of Wilson Creek Rd which flows directly into Lyle Creek (which flows west on Lyons Road and then south adjacent to the east side of Wilson Creek Rd). The water in the ditches of both Wilson Creek and Lyons Road exceeded the bounds of the ditches significantly, flooding the parcel at the northeast corner of the intersection of Lyons Rd and Wilson Creek.

The trees they intend to plant on the West and Southern boundaries of the property will do little to "mitigate the material impacts of the development..." and there appear to be no trees planned for the northern boundary. The site is "incompatible with the existing neighboring land uses." Given the fact that the meat processing industry is noted for having significant collateral negative aspects and the fact that the site plan depicts a density of buildout concentrated on the western 400' of the parcel, it is clearly not in keeping with the "rural character" of the area and trees on two sides the parcel will not mitigate this disruption.

Additional Concerns:

- Is the Wilson Creek Rd frontage with the sharp right angle turn onto the highway (as denoted on the site plan) sufficient for livestock trucks and the offal removal trucks to access Wilson Creek Rd—with its minimal shoulders, its 50mph speed zone—without encroaching into oncoming traffic and/or impeding the flow of traffic posing a potential threat to public safety?
- What are the Hydrogeologic Framework and Groundwater/Surface-Water Interactions at the site? Is the groundwater at the site susceptible to contamination?
- What are the cleaning chemicals to be used on the site? They are characterized in the most recent Project Narrative as "organic and environmentally friendly," but they should be evaluated by a hydrogeologist and potentially a chemist to assure they will not contaminate the site.
- Will the quantity of water used for this business affect Critical aquifer recharge?
- What is the nature of the contaminants that will enter the septic system? Is it possible to isolate contaminants from the septic system?
- What are the details regarding the licensed disposal company that will pick up the offal multiple times a week?
- What is the likely travel distance of any contaminants/hydraulic conductivity at the site?
- What is the likelihood of the contamination of Lyle Creek—a Type F (fish bearing) stream?

- Is the buffer zone reliable protection considering the high-water table at the site? ...and in times of seasonal flooding?
- The additional traffic on the road is not satisfactorily quantified—large and small stock trucks to transport 20-30 head of cattle a day, the traffic of 20 employees, and multiple weekly trips for offal removal.
- The Well Report for the site notes a domestic well, not the Class B Commercial Well as described in the Project Narrative.

Given the strong concerns of the neighbors—the high probability of seasonal flooding with its potential contamination to the groundwater, the concentrated buildout of the site, the concerns regarding a meat processing facility with a kill facility on domestic sewage/septic system, the additional traffic, the unpleasantness of living in close proximity to a site where 20-30 head of cattle are slaughtered 5 days a week—the fact the county “expects to issue a Determination of Non-Significance for the proposal” seems totally unwarranted. There is not enough detail in the in any of the Project Narratives, SEPA Checklists, or the Water, Offal & Indelible Product Mitigation plan to justify a Determination of Non-Significance and the applicants “proven and measurable experience” in ranching is in no way supported in the application, and any expertise in meat processing facility with a kill facility is not addressed. It is not clear that their expert/author of the Offal & Indelible Product Mitigation plan has any experience regarding rural septic systems.

We still unequivocally oppose this Conditional Use Permit Application—but in the event this application proceeds we want a complete hydrogeological assessment (which includes a chemical analysis of potential contaminants) to be conducted on the plan to determine the susceptibility of groundwater to contamination to determine the potential risks to our public health.

We wish to be notified when the Public Hearing is scheduled for this project.

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