

From: [Julee Trudeau](#)
To: [Kelly Bacon \(CD\)](#)
Subject: Nunnaly Holdings
Date: Wednesday, April 21, 2021 1:06:37 PM
Attachments: [SEPA comments.pdf](#)

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Kelly

Please find the attached comments and letter addressed to the county commissioners, public works, community development, and prosecuting attorney's offices from Strande residents concerned with the Nunnaly project. This letter and comments are in response to SEPA.

Julee Trudeau

April 12, 2021

To: Kittitas County Public Works Department, Kittitas County Community Development Services,
Kittitas County Prosecutors Office, Kittitas County Commissioners

Re: Hansen Road Development

We are a group of concerned Kittitas County residents living on and around Strande Road. Strande Road is a one of three north-south local roads that connects Hansen Road and Manastash (both east-west collector roads). Brown and Cove Road to the east and west of Strande Road are far less used by local traffic for cross county destination trips. Brown Road is under-utilized due to its close proximity to town and Cove Road due to it being located 5 miles from town. As a result, Strande Road and its centralized location makes it an overutilized route for its street classification as a local road and substandard roadway geometry. Strande Road properties are a mix of actively farmed land and residential farm properties. This north-south local road is not only used by daily commuters, but is frequently used by large semi-trucks, delivery trucks, oversized farming equipment, large concrete and dump trucks, and construction vehicles. This road was not designed to accommodate this traffic demand and size of vehicles, it has sharpe 90 degree curves that follow property/section lines and a narrow paved surface (14-16 feet wide) with gravel shoulders. As a result, local traffic typically drive down the center of the roadway and slow to pass oncoming traffic. The Ellensburg School District Transportation Department reported that their bus route driver has to stop when oncoming traffic exists at the curves and slow to 5 mph to manuever the sharpe curves.

Strande Road also has accommodated the recent Sagebrook community an extension of Susan Road and Crossroads Drive developments. These additional residential developments have added 30 homes and over 300 additional trips/per day to Strande Road. Within the past 5 years, there have been serious accidents along Strande Road, one involving a vehicle that did ran off the road at the sharpe curve, impacted, and broke the overhead power pole.

A new development between Hansen Road and Strande Road is proposing to change its original access from Hansen Road to Strande Road, adding more residential traffic to this local road. The desire of the residents of this community that support this letter is to maintain the integrity of the residential farming and active farming lands, which is what originally drew us to the area. An additional 13 residential homes along Strande Road increases traffic to a roadway that already has many challenges. We desire that as part of the process to change access from Hansen Road (a wider roadway designed to collector road standards) to Strande Road (a local road) that the platting process is re-opened and current design standards and necessary upgrades are made to Strande Road to accommodate the additional demand placed on this route.

Thank you for your attention in this matter.

1. <u>Stephan Stein</u>	2. <u>Melody T. Stein</u>	401 Strande Rd. Ellensburg, WA 98926
3. <u>DONALD BECHER</u>	4. <u>SHERIL BECHER</u>	
5. <u>[Signature]</u>	6. <u>[Signature]</u>	140 Crossroads Drive Ellensburg
7. <u>Matt Sweet</u>	8. <u>William Earty</u>	571 BARNES

Brent Hancock 191 crossroad Dr.

421 Strande Rd Ellensburg WA
60 Crossroads
1492 Strande
261 Crossroads Dr

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SEPA #A.1.

The project is referred to as Manastash Estates (SEPA), Hansen Road Development (Grading Permit), Platinum Ellensburg Strande Road 12-Lot Development (Traffic Scoping Analysis). Applicant should clearly identify this project under a single name.

SEPA #A.6.

The project includes 2 phases, the initial site development is Phase 1. Phase 1 includes grubbing, excavation, embankment, grading, paving, signage and turf establishment. It does not include clearing, there are no trees in Phase 1. It is unclear if Phase 2 includes well drilling and residential single-family house construction or if Phase 3 includes house construction. This phase may include tree clearing along the northern parcels and will include grubbing and turf establishment.

SEPA #A.7.

The checklist does not mention any landscaping, rockery, signage, and landscape lighting that may be included by the developer at the entrance to the development.

The current subdivision does have future expansion plans. The subdivision proposed an additional parcel be added to the subdivision to establish a new access from Strande Road. The developer has not revised the plat to include parcel 748433 to the existing subdivision. This subdivision is over 5 parcels and requires a plat revision and public hearing.

SEPA #A.9.

The SEPA application does not include the access permit. The subdivision requires an additional parcel be added to the subdivision to establish a new access from Strande Road. The current access is from Hansen Road. Hansen Road is a collector road. It is a wider road than Strande Road. Moving this access would relocate this subdivision access to a lower classification road. It is not an equal or better access to the existing access location. A new access has not been approved by the County. The SEPA application is based on the assumption that a new access is approved, this cannot be approved without a plat revision. The access permit is based on ROW or easement from a parcel that is not part of the subdivision. The developer is proposing to add a parcel to the exempt segregated lots. This type of land division was found to be a violation of the Growth Management Act. Further changes to this subdivision must be subject to current design standards, codes, and regulations, including improvements to adjacent roadways impacted by the developer.

SEPA #A.10.

KCC 12.01.090 Responsibility to Provide Roadway Improvements.

A. Any land use development activity which will impact the Level of Service (LOS), safety, or operational efficiency of abutting or serving roadways, or is required by other County Code or ordinance to improve such roadways, shall improve those roadways in accordance with these Standards. The extent of the off-site improvements to roads serving a development shall be based on a concurrency analysis of the proposed land use development impacts. The concurrency analysis shall be prepared in accordance with KCC 12.10.

In 2002, the existing access for the 125-acre parcel was approved as part of an exempt segregation and subsequent boundary line adjustment provided access off of Hansen Road. The Kittitas County Commissioners approved this access. Changing this access is a direct result of the developer motivated to save money on a bridge across the Manastash Creek and avoid the additional time it takes to properly permit the project from its designated access. Hansen Road is the primary road next to the site. It takes 5 additional 90 degree turns and over 1.25 miles to reach the proposed access. The proposed change is a less direct route and places more traffic demand on an

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underdeveloped rural local county roadway. Strande Road is narrow and vehicles travel down the middle of the road. Opposing traffic slow to pass, vehicles passing oncoming trucks, truck-trailer, and semi-trucks must pull off the pavement to pass.

This access has been the only identified subdivision access since exempt segregation from 4 parcels into 12 parcels. The access permit has not been approved and a change of access requires a plat revision to add an additional parcel to the subdivision and move the location of the access. The exempt segregation was for an active farm, sold by Anderville Farms. The access location was clearly disclosed to the developer. The exempt segregation process did not disclose that the division of land was for residential use. The County should maintain the current access.

The new access is not an improvement in access, it is a proposed cost and time savings to the developer. The change does not benefit the community or improve access for vehicles and non-motorized users (pedestrians and bicycles), it makes it worse. The access change is a significant change to the subdivision originally granted by the County. The proposed access change will be a hardship to and directly affect the property at 1311 Strande Road with headlight glare and paved roads along 3 sides of their property (west, south, and east). There are several adjacent residential properties that are also impacted by headlight glare by this project and oppose this access change between Hansen and Strande Road.

Strande and Barnes roads were not designed to accommodate heavy truck traffic. The 2020 traffic counts indicated 43% trucks to 57% vehicles on Strande Road. Both Strande and Barnes roads have sharp curves and narrow paved lanes, their shoulders are no longer established and gravel. Hansen Road is the primary road with 12' paved lanes and wide shoulders. The residents along Strande Road, from Manastash to Hansen, will experience a decrease in level of service and operational efficiency, in addition to over 1000 additional construction vehicle trips, during the multi-year construction of this project. This development will result in additional delivery truck traffic on Barnes and Strande Road.

KCC 12.01.090 Responsibility to Provide Roadway Improvements.

- B. *Any land use development activity abutting and impacting existing roads shall improve the frontage of those roads in accordance with these Standards. If the proposed development is found to impact areas located beyond the development, improvements to these areas shall be required. The extent of improvements shall be based on a concurrency analysis of the proposed land use development impacts in accordance with KCC 12.10.*
-

The proposed development impacts the existing county road and under this KCC code the developer is responsible for the improvements required along Strande Road between Manastash and Hansen Road. The developer has the option to retain the existing access off of Hansen Road which are less likely to require county road improvements and adverse affects to adjacent property owners. Under KCC 12.10.040, I am requesting the County consider undertaking an independent TIA to confirm or revise the results of the developer's TIA.

KCC 12.01.090 Responsibility to Provide Roadway Improvements.

- C. *All road improvement requirements for a land use development activity shall be constructed to these Standards prior to the issuance of final approval, unless a performance guarantee is provided as outlined in KCC 12.01.150.*
-

The developers grading plan includes a 4-foot profile grade between Strande Road Sta. 0+00 to the first curve at Sta. 4+24. The existing ground is flat, this grade change does

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not exist. As a result the developer and his engineer must gather accurate topography and validate the existing conditions to design a roadway. Designing without accurate topography would result in an unnecessarily elevated roadway, additional embankment fill and a roadway design that will place stormwater from the developer's road at Sta. 4+24 the onto Parcel 836636. The grading plan does not include adequate information to address stormwater created by the new PGIS. Temporary and permanent drainage plans are required and must be designed to convey and contain stormwater on the project site. Culverts are required at driveway and/or access approaches.

The developer has not located the new road, 100 feet from the existing driveway for Parcel 836636, which begins at the property line.

KCC 12.01.090 Responsibility to Provide Roadway Improvements.

D. Subdivisions will not be approved unless a recorded continuous public or private access easement or right-of-way to the subdivision exists.

The current subdivision does not have access from Strande Road. The subdivision requires an additional parcel to reach Strande Road. The developer has not provided the easement or ROW necessary to connect the adjacent 34-acre parcel to the 125-acre parcel project. The subdivision plat requires a plat revision to accomplish this. SEPA should restart after the plat revision is completed, a public hearing is conducted and only with the necessary improvements to Strande Road between Hansen and Manastash Road.

KCC 12.01.090 Responsibility to Provide Roadway Improvements.

H. Contiguous parcels, parcels under the same ownership and/or parcels sharing access easements/roads that submit any land use development application, shall be reviewed as one development for transportation and road improvement purposes.

A plat revision is necessary to add the 13th parcel to the subdivision and change access from Hansen Road to Strande Road. The 125-acre parcels in the subdivision is not under the same ownership as the 34-acre parcel. The subdivision is owned by Nunnally Holdings, LLC, the 34-acre parcel is individually owned.

SEPA #A.11.

The access revision proposes a 1-mile roadway from Strande Road through the development. The existing access provides a roadway from Hansen Road that is ¼ mile less and accesses all of the parcels. Access has not been granted from Strande Road.

SEPA #A.12.

Parcel 13 is incorrectly labelled on the project maps provided within the construction documents for the project site.

SEPA #B.1.e.

The elevation of the proposed access road as currently designed in the grading plan would require additional fill be imported to the project site. The terrain is level and there is no elevation change between Sta. 0+00 to 4+23. It is impossible for existing terrain change proposed the developer and the engineer. The developer needs to collect a topographic survey to validate the terrain on the 34-acre parcel. The roughly 6 feet of elevation change directly affects the adjacent parcel and will result in stormwater runoff onto the adjacent parcel.

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SEPA #B.1.f.

A comprehensive temporary erosion and sediment control plan is necessary for this project that includes abatement for wind-blown matter from aeolited soils. The project area is known for high wind conditions. Several properties to the south of the project site will be affected by dust during construction.

SEPA #B.1.h.

Proposed measures to reduce or control erosion have not been included in the applicant's submittal. The applicant must describe how stormwater and construction activities will be mitigated. Silt fence, straw wattles, water for dust control, and construction stabilized entrances are minimum measures. Protection of KRD waterways and location of roadway adjacent to the irrigation canal must be satisfied by the irrigation district.

SEPA #B.3.a.5.

The developers SEPA checklist erroneously indicates there are no impacts to the 100-year floodplain. Parcels 18118, 708433, 698433, 058333, 18115 are located in the 100-year floodplain of the Manastash Creek. A site plan showing the 100-year floodplain is required to be shown on the site plan.

SEPA #B.3.b.1.

The developer indicated that the wells were to be constructed by the developer in advance of selling the lots. This is contradictory to the information stated in the SEPA checklist. Each residence will include water for landscaping. An estimate of water use must be included in the SEPA checklist for each property. It should be based on each parcel size. Landscape water will be discharged into the ground and therefore impact overall groundwater.

SEPA #B.3.b.2.

The developers SEPA checklist does not list general size and number of systems. There are 13 parcels in total, 4 parcels are located within the 100-year floodplain of the Manastash Creek. The applicant should identify these properties will require a required offset for septic systems from the creek.

SEPA #B.3.c.1.

The SEPA checklist indicates that stormwater will runoff and flow to adjacent parcels and/or the irrigation ditch. This is not an acceptable storm water strategy. The new PGIS for the existing access off of Hansen Road is approx. 71,000 SF, the new PGIS for the proposed access off of Strande Road is 103,000 SF which is approx. a 30% increase in pollution generating impervious surfaces. This is not equal or better than the access from Hansen Road.

SEPA #B.3.c.2.

The SEPA checklist does not indicate where the well spoils and bentonite will be placed during well construction. The checklist does not list where foundation excavation materials will be placed and where the sites construction concrete wash out area will be located for 13 residential foundations. This site is located within 200 feet of the Manastash Creek. The Manastash Creek is not shown in the developers plans.

SEPA #B.3.d.

The developer does not describe mitigation measures to prevent runoff water impacts to adjacent parcels as indicated in SEPA #B.3.c.1.

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SEPA #B.4.a.

Crops are missing from the SEPA checklist. These parcels are all active farms. Trees and shrubs along the Manastash Creek are not identified.

SEPA #B.4.d.

Native plants within the project site that are removed as part of this project will not be used to enhance or preserve the site.

SEPA #B.4.e.

Noxious weeds commonly found in the area are various types of knapweed and thistle. Reference the 2020 Kittitas County Noxious Weed List.

SEPA #B.5.c.

Migratory duck species regularly are found using the irrigation ditches and Manastash creek waterways.

SEPA #B.7.b.1.

Moving the access to Strande Road would increase and add concentrated noise to the existing residential homes.

SEPA #B.7.b.2.

Construction equipment with backup beacons and large trucks will increase noise levels around the project site. The hammering from drilling wells will increase noise levels at the project site.

SEPA #B.8.a.

Current land use is rural working. Each parcel is sub-20 acre lots. The SEPA checklist does not indicate the current land use for the project site is rural working land and is changing the designation to rural residential.

SEPA #B.8.b.

The current land use has historically been working farmland for the past century. 160 acres of agricultural land will be converted to residential land use (nonfarm). It also takes farmland out of production in our valley indefinitely which is an irreversible economic loss to our community for one of its primary exports high quality forage products (timothy and alfalfa hay). These high quality fields and their products when taken out of production directly affect one of the valley's largest employers in our valley.

SEPA #B.8.b.1

The additional traffic by changing access to Strande Road will adversely affect farming operations for several large parcels along Strande.

SEPA #B.8.g

Parcels 18118, 708433, 18116, 058333, and 18115 are located in the Rural Conservancy zone.

SEPA #B.8.h

The County should evaluate whether the Manastash Creek is a critical area given its close proximity and contribution to the Yakima River.

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SEPA #B.8.j

Several properties located along the north end of Strande Road and along Barnes Road would be subject to gross impacts to their properties and landscaping if Strande Road is widened. Widening may result in displacement of Environmental Justice populations. Hansen Road requires no additional widening to accommodate the development access.

SEPA #B.8.k

Displacements can be avoided by using the existing access off of Hansen Road.

SEPA #B.8.L

Development will not be compatible with existing or projected land use and plans. It is changing land use.

SEPA #B.8.m

Development will not reduce or control impacts to agricultural lands of long-term commercial significance. Farm lands will be destroyed and replaced with residential homes.

SEPA #B.10.a

Exterior building materials are likely wood materials.

SEPA #B.10.b

Views of Mount Stuart and the Enchantment Mountain Range will be obstructed or significantly altered.

SEPA #B.11.a

Headlight glare will impact local residents along Strande and Barnes roads, especially at Parcel 836636, 168433, 11647, 398533, 338333, 128233, and 308233.

SEPA #B.11.d

Access to the development from Hansen Road does not present headlight glare impacts.

SEPA #B.12.a

Several non-motorized users bike and walk along Strande Road. There are no shoulders for non-motorized users.

SEPA #B.13.a

The barn on Parcel 836636 was constructed around 1900-1910. Several other barns of this timeframe exist along Strande Road.

SEPA #B.13.b

No data is provided for Cultural Resources. Consultation with Yakama Nation will be important to identify any sensitive areas along the Manastash Creek.

SEPA #B.14.a

The developer clearly states that Hansen Road is a larger roadway, better equipped to handle the traffic demand of this site. It is not accessible, because it is the developers responsibility to build a bridge across the Manastash Creek. This is a profit-driven change in access. Strande Road is not of significant size to manage the vehicle and large trucks this new development will require to construct.

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SEPA #B.14.b

The site is served by the Ellensburg School District Transportation Department, it is public transportation and is federally funded. The developer will need to provide a widened roadway for vehicles parked at the bus stop and an adequate area for vehicles to turn around without using a County Road to do so.

SEPA #B.14.d

The developer should be responsible for all improvements between Manastash Road and Hansen Road. To change access from Hansen Road to Strande Road, the developer should improve those sections of Strande Road to collector road standards to match the existing Hansen Road conditions. This project will add over 120 trips per day and impacts to the roadway section along Strande Road with heavy truck trips.

SEPA #B.14.f

Based on the 2020 traffic counts collected by the County, 43% trucks/ 57% vehicles. The SEPA does not indicate the transportation model used to make the estimates for trips.

SEPA #B.14.g

The proposal to move access from Hansen Road to Strande Road will directly and adversely affect large farming operations. Hansen Road has two 12-foot lanes and 4 foot shoulders in most sections to accommodate large farming equipment. Strande Road is a total of 14 to 16-foot wide including lanes and shoulders. When large farming equipment is passing oncoming vehicles they must carefully pass, but when large farming equipment is required to pass semi-trucks or large construction equipment, one vehicle must pull off the road onto the ditch slope or into a nearby driveway.

SEPA #B.14.h

Access to the development from the existing access that is owned by the developer off of Hansen Road would minimize current impacts to farming operations.

SEPA #B.16.a

Existing irrigation water rights are available but, will require creating a KRD franchise for use among the 13 parcels.

SEPA #B.16.b

Will telecommunications service be one of the proposed utilities within the proposed development.

General comments on the project.

This project includes 12 lots that are under 20 acres. The administrative segregation process was amended in 2011 so that the division of land created by such a process was limited to the division resulting in no more than 10 lots and where no resulting lot was less than 20 acres in any zone (KCC 16.06.010). The amendments also established a clearer review process, including a provision that provides that any administrative segregation would expire within 12 months of its preliminary approval if not completed. This parcel was approved for exempt segregation with an access off of Hansen Road and the approval was completed in 2002. KCC 16.06.020 Requirements, Bullet 3 states that land reconfigured within, and parcels created by an administrative segregation shall not be reduced in size through a boundary line adjustment below 80 acres if within the Commercial Forest Zone or below 20 acres for all other zones. The reconfiguration of access to this site will result in a change to lots sizes that are already below 20 acres. These changes would be in conflict with KCC 16.06.020.

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The developer proposed to fill over an existing irrigation canal between parcel 18115 and 058333 for the hammerhead turnaround. This is fill over unsuitable soils and must be addressed in the grading plans and roadway sections.

A hammerhead turnaround is not equal or better than the cul de sac that was included in the original exempt segregation. The fire department will be required to use a spotter when trucks backup using this turnaround. Ellensburg School District Transportation Department policy dictates that buses are not allowed to back up without a spotter, this includes hammerhead turnarounds. The ESD Transportation department will not allow buses down this road. Parking spaces for drop-off/pick-up are not provided on the grading plans. Vehicles should not be allowed to turnaround on County Roads.

The developer's proposal to move access from Hansen Road to Strande Road extends the distance for emergency vehicles to access the project site. This is an additional 1.25 miles and maneuver several (five) 90-degree curves along a narrow rural local road. Access to the site from Hansen Road is a more direct route from the district fire station.

Within the past 5 years there have been several accidents along Strande Road including a serious accident involving a passenger car that ran off the road and hit the adjacent overhead power pole at the westerly 90-degree curve and a semi-truck approached the easterly 90-degree curve and hit the adjacent overhead power pole near parcel 11647.

The SEPA checklist does not address avoidance and minimization of impacts to the Stuart View Irrigation District that serves Strande Road parcels and West Side Irrigation District that serves Hansen Road parcels.

The developer's proposed roadway impacts a buries an irrigation pipe that crosses Parcel 836636 and provides irrigation water to 15367.

It is recommended that a guardrail is placed adjacent to the roadway along the section of roadway that abuts the irrigation canal to prevent vehicles from sliding into the canal.

KRD requires an irrigation water franchise to split water rights to parcels.

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1311 Strande

1. Julie Trudican	2. Dant Bland
3. David Bland	4. Larry Bland
5. Paulina z c	6. Heidi Bland
7. Shannon Bland	8. Federico Garcia

3830 Manastash

2210 Strande

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646 Strande	1. Mark Collier	2. Lisa Collier
751 Strande	3. Raleigh Roehl Stefan Gen	4. STEFAN ZAKRZEWSKI
641 Strande	5. Steve Montgomery	6. Steve Montgomery
630 Strande	7. Sharby R. McLeure	8. Dave Deed
451 Strande Rd		1311 Strande

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324 Susan Rd	1. Dan Mandlo	2. 9-47	550 SUSAN
331 Susan Rd	3. David Van Dorn	4. 9-47	552 SUSAN
334 Susan Rd	5. Sheryl Carson	6. 9-47	554 SUSAN
334 Susan Rd	7. 9-47	8. 9-47	887 SUSAN