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011833

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Kittitas County Community Development Services

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**RE: SEPA Environmental Checklist — Application SE-26-00003 Kittitas PUD #1
Headquarters, 4271 Kittitas Hwy, Parcel 051833 Formal Comment and Request for
Determination of Significance**

Dear SEPA Responsible Official:

I am the owner of property in the immediate vicinity of the above-referenced project site (011833) and I submit these comments as a formally affected party pursuant to WAC 197-11 and RCW 43.21C. I am writing to request that Kittitas County issue a Determination of Significance (DS) for SEPA Application SE-26-00003 and require preparation of a full Environmental Impact Statement (EIS), or in the alternative, issue a Mitigated DNS only after compelling the applicant to correct the material omissions and inadequate responses identified herein.

The SEPA Environmental Checklist submitted by Manastash Architecture Planning and Development (MAPD) on behalf of Kittitas PUD #1 contains numerous incomplete, evasive, and unsupported answers that prevent the County's Responsible Official from making an informed threshold determination. Washington law requires that checklist answers be complete and accurate. As detailed below, this checklist falls substantially short of that standard.

**1. Zoning and Land Use Compatibility — The Project Appears to Require a
Conditional Use Permit or Rezone**

The checklist discloses that the subject parcel is zoned Agriculture 20 (A-20) with a comprehensive plan designation of Rural Working Land Use. The proposed project — a 10,200 square foot pre-engineered metal building, 6,300 square foot administration

building, material storage yard, pump house, and two 60,000-gallon water tanks — is a large commercial/industrial utility facility. This use does not conform to the A-20 zoning district on its face.

The checklist asserts on page 8 that 'the project is in keeping with the rural character of the site and surrounding area, in compliance with all applicable County and State codes,' but provides no analysis, citation to applicable zoning code provisions, or explanation of how a utility headquarters satisfies A-20 use requirements. The County must require the applicant to specifically identify the zoning code provision under which this use is permitted outright, or acknowledge that a Conditional Use Permit (CUP) is required and initiate that process. The failure to address this fundamental land use compatibility issue is a material omission in the checklist.

2. Transportation — Traffic Analysis Not Submitted; Claims Unsupported

On page 10, the checklist states: 'A traffic memo is being prepared' by PH Consulting, but that memo was not included with the application. Despite not having submitted the traffic analysis, the applicant simultaneously claims on page 11 that the facility 'replaces an existing facility, therefore the demands on transportation and public services are more or less neutral.'

These two statements are contradictory and both are deficient. Specifically:

- The traffic analysis must be completed and submitted as part of the application, not after. The public and the County cannot evaluate transportation impacts without it.
- The 'replacement facility' claim is misleading. The existing PUD facility is located in a clearly commercial area with significant commercial traffic. The impacts of 85 or more daily vehicle trips on Kittitas Highway from what is currently vacant agricultural land are new impacts at this location, not neutral replacements.
- The checklist does not address: sight distance at the proposed driveway access; turning movements for large utility trucks and equipment; impact to the highway at peak hours; or the cumulative effect of occasional after-hours deliveries the applicant acknowledges.
- The checklist does not identify or quantify truck traffic associated with a utility maintenance yard and materials storage facility, which may be substantial.

I request that the County require submission and independent review of the complete traffic analysis before the comment period closes, or extend the comment period to allow meaningful public review of that document.

3. Surface Water — 'No' Answer Is Unsupported and Likely Incorrect

The checklist answers 'No' to Question B.3.a.1: 'Is there any surface water body on or in the immediate vicinity of the site?' This answer is implausible for a property in the Kittitas Valley and is directly contradicted elsewhere in the checklist.

On page 5 (Stormwater, Question c.1), the applicant states that runoff 'will control the discharge into the existing County ditch infrastructure at a pre-development rate.' The existence of County ditch infrastructure on or adjacent to the site is itself an acknowledgment of a surface water conveyance feature in the immediate vicinity of the project. Irrigation canals and ditches are surface water bodies under Washington's SEPA rules.

The County must require the applicant to correct this answer and provide a proper inventory of surface water features — including irrigation ditches, canals, and any seasonal drainage — within 200 feet of the project boundaries.

4. Stormwater — Inadequate Analysis for 53.5% Impervious Cover Conversion

The applicant discloses that approximately 53.5% of the 9.65-acre site will be covered with impervious surfaces after construction. This represents conversion of more than five acres of previously permeable agricultural land to impervious cover, a major hydrological change.

The sole proposed mitigation described is 'swales and a detention pond with natural filtration.' No engineering calculations, detention pond sizing, downstream drainage analysis, or stormwater management plan has been submitted with this application. In a rural agricultural valley where adjacent landowners rely on established drainage patterns, this level of impervious cover conversion without a complete stormwater engineering report is insufficient.

The County should require a complete stormwater report prepared by a licensed engineer, including detention pond sizing calculations, downstream impact analysis, and documentation that the detention facility will adequately control discharge at the pre-development rate claimed by the applicant before any threshold determination is made.

5. Wildlife and Migration — 'Not Known' Is Not an Adequate Response

The checklist identifies hawks as observed on or near the site, but then answers 'Not known' to both the threatened/endangered species question (B.5.b) and the migration route question (B.5.c). No wildlife study, biological assessment, or habitat evaluation is referenced.

The Kittitas Valley is widely documented as a significant raptor migration corridor. Species including ferruginous hawks, Swainson's hawks, and other raptors are known to use this valley during migration. The site is a former agricultural field — precisely the type of habitat that provides foraging opportunities for raptors and other migratory species.

'Not known' is not a permissible answer when a simple habitat evaluation or consultation with WDFW would readily provide the information. The SEPA checklist instructions require that applicants consult with agency specialists or private consultants when needed. The applicant has failed to do so. The County should require a wildlife habitat assessment by a qualified biologist before issuing any threshold determination.

6. Historic and Cultural Preservation — Section 13 Entirely Unanswered

Every question in Section 13 (Historic and Cultural Preservation, pages 10) is answered 'N/A.' No professional archaeological survey, cultural resources assessment, tribal consultation, or GIS-based cultural resource review is mentioned or referenced.

The site is a former agricultural field in the Kittitas Valley, a region with documented Native American cultural presence and historical significance. Washington's SEPA rules (WAC 197-11-960) require that applicants describe the methods used to assess potential impacts to cultural and historic resources. Simply writing 'N/A' across the entire section — without conducting any investigation — does not satisfy this requirement.

At a minimum, the applicant must: conduct a records search through the Washington State Department of Archaeology and Historic Preservation (DAHP) WISAARD database; document any tribal consultation; and consider whether a Phase I archaeological survey is warranted. I request the County require this information before proceeding.

7. Environmental Health — Transformer Storage Inadequately Addressed

The checklist acknowledges on page 6 that the project 'involves storage and handling of electrical transformers, which are handled and maintained using industry best practices,' but then states there are 'no anticipated environmental health hazards.' The checklist provides no information on:

- The number and types of transformers to be stored on site
- Whether any transformers contain or may contain PCB-containing oil
- The design of any secondary containment for transformer oil
- Spill response planning

A utility maintenance facility storing electrical transformers in a rural location without municipal stormwater infrastructure presents genuine environmental health concerns that cannot be dismissed with a single sentence. The County should require the applicant to provide complete information on transformer inventory, containment design, and applicable permit requirements under RCW 70A.300 (Hazardous Waste Management Act).

8. Recreation — Palouse to Cascades State Park Trail Impact Dismissed Without Analysis

The checklist acknowledges on page 9 that the Palouse to Cascades State Park Trail crosses a neighboring parcel, but states 'No' to any recreational impact. No analysis is provided.

A large industrial/commercial facility with a 29.5-foot metal building, storage yard, utility vehicles, security lighting, and 85+ daily vehicle trips directly adjacent to a state trail corridor raises legitimate concerns about noise, light, visual character, and the recreational experience on that trail. These impacts deserve analysis, not a blank 'No.'

9. Phased Development and Future Expansion Not Adequately Disclosed

Question A.7 asks whether there are any plans for future additions or expansion. The applicant answered 'No plans for future additions at this time.' However, the checklist itself contains language suggesting future growth: Question B.8.i states the facility will have '14 daily employees (up to 17 in the future),' and the Group B Water System being pursued simultaneously is designed with a 'peak factor' applied to accommodate more than the stated 14 employees.

SEPA requires disclosure of 'all parts of the proposal, even if you plan to do them over a period of time or on different parcels of land.' The hedging language 'at this time' in the expansion answer, combined with the disclosures of anticipated future employee growth, suggests that future expansion is reasonably foreseeable and should have been addressed in this checklist.

Summary of Requests

Based on the foregoing, I respectfully request that Kittitas County Community Development Services:

- Issue a Determination of Significance and require preparation of a full Environmental Impact Statement, or

- In the alternative, require the applicant to submit complete responses to all deficient checklist sections identified above — including the missing traffic analysis, a stormwater engineering report, a wildlife habitat assessment, a cultural resources assessment, and complete hazardous materials disclosure — and reopen the public comment period upon resubmission; and
- Provide me with written notice of all future actions, hearings, and decisions related to this application at the address and email provided above.

I reserve the right to supplement these comments as additional information becomes available, and to appeal any threshold determination that is issued without adequately addressing the concerns raised herein. Failure to raise issues during this comment period can limit future appeal rights, and I am submitting these comments to preserve my full rights under SEPA and applicable Washington law.

Thank you for your careful consideration of these concerns.

Respectfully submitted,



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Parcel Ownership Affected 011833

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