

CU-21-00003 Ryegrass Limited Purpose Landfill Comment Matrix

Comment Author	Comment Summary	Applicant Response Summary	Staff Response
KC Building Services	Had no comment as it appears there are no structures proposed	Comment acknowledged	The project application does not include any structures
WDFW	Wanted to protect shrubsteppe/sagebrush habitat and consult with applicant for avoiding and/or mitigation regarding clearing of the habitat. Also mentioned to restore sagebrush when no longer in use.	WDFW reviewed the project location on 05-04-21 with a site visit. WDFW agreed that the area the proposed landfill is already clear of sagebrush and suggested that the site be replanted with native grass and sagebrush at closing of portion of landfill	Staff was with WDFW on the site visit on 5-4-21 and received the same comments as the applicant. The proposed project will be conditioned to have native grasses and shrubsteppe replanted once the landfill is no longer in use.
KVFR	KVFR mentioned they are contracted for fire protection at the site and the primary risk to the site is surface wildland fire. KVFR recommended fire breaks and areas of refuge for persons and vehicles on site to allow fire to burn past safely.	Ryegrass site provides areas of refuge in operational areas clear of vegetation such as the attendant and maintenance area, concrete processing area, and septage lagoons.	The proposed project will be conditioned to indicate places of refuge in case of fire on final site plan.
KC Public Health	KC Public Health mentioned they had been working with the applicant and DOE with rules and regulations and did not have anything to add to their comments	Comment acknowledged.	The project proposal will have to meet all Public Health and Department of Ecology Rules and Regulations for Limited Purpose Landfills
KC Public Works	KC Public Works provided comments regarding topographic map standards of WAC 332-130-145 and having Public Works Title Block instead of Solid Waste on Site plan.	Logo and contact information will be revised to Solid Waste. The map standards was not included due to detail in the permit application as would be required for record of survey	Record of Survey will not be required for the Conditional Use Permit and does not need to meet the WAC topographic map standards.
Ecology	The Washington State Department of Ecology provided comments regarding having to get a permit modification in accordance with WAC 173-350-710. Mentioned that the addition of cardboard and carpeting will be evaluated by Health and Ecology and had environmental concerns with adding those as acceptable uses. Mentioned that financial assurance would be required to support expanded closure and post-closure operations.	Will revised application to clarify that carpet and cardboard will not be accepted in bulk but only in de minimis amounts present in mixed loads. Will continue to Work with Ecology and Public Health on permitting	Application was revised to only allow de minimis amounts of cardboard and carpet in mixed loads. This will be part of the conditions on the conditional use permit
Sage Hills 2 Homeowners Association	Sage Hills 2 Homeowners Association has concerns about the safety/potability of groundwater in the area due to the geology of the area. They are concerned that there is a secondary gate east of the main gate that is normally unlocked and wanted this fixed to prevent illegal dumping. Has concerns about toxic substances in applicances being put into the landfill. Their last concern is about sensitive plant species in the area and mentioned a new SEPA should be required from the 2004 one.	A SEPA addendum was included with the application from the 2004 SEPA. The hydrogeologic demonstration remains consistent that the contaminant levels in the waste and leachate are unlikely to pose adverse impact to the environment. Coordination is ongoing with with neighboring gate owner to provide a lock on the gate. Appliances with hazardous substances are prohibited at the landfill. WDFW reviewed the area in a site visit and determined no significant impacts to habitat.	The proposed landfill expansion meets all requirements in WAC 173-350-400. and is monitored by Public Health/Ecology for groundwater contamination. The proposed project will be conditioned to not allow unsecured access to the site. A SEPA addendum from 2021 was submitted with the application.

Sandi Ryan	Has concerns about tarps being included in the construction waste.	Plastics are an acceptable material under WAC 173-350-100	Plastics appear to be allowed in Limited Purpose Landfills under WAC 173-350-100.
Mark Spisak	Mentioned that the landfill is in need of an update to original SEPA and that potable water and subsequent water permits.	The expansion of the landfill is following established regulatory requirements.	The proposed project is meeting all regulatory requirements and is conditioned to meet all Department of Ecology and Public Health Permits and Requirements. The proposed project will be conditioned to meet all criteria in WAC 173-350-400 regarding permitting.
Nels & Charli Sorenson	Had questions about how the landfill in the 90's managed to contaminate surrounding wells and groundwater. Has concerns about groundwater contamination and having the landfill being unlined with the geology in the area	The Ryegrass MSW landfill was not closed due to "contamination of the underlying groundwater" nor was any contamination "aided by the nature of the underlying fractured CRFB rocks layers." It was closed after surficial leakage of leachate which was corrected after closure. The landfill is compliant with the downgradient well requirements. Surrounding groundwater wells referenced are onsite wells, and do not represent offsite migration. These wells are screened in a shallower, limited yield saturated zone which is not used for drinking water, and is above the deeper basalt aquifers where most drinking water wells are completed. Test results, though above drinking water standards, are generally consistent with background levels and are not indicative of a landfill release. Groundwater reporting has been ongoing to Kittitas County Public Health Department and the Department of Ecology with no cause for corrective action beyond the initial closure of the MSW landfill.	The municipal solid waste landfill was not closed due to contamination of ground water but surficial leakage of leachate which was corrected. The landfill is currently meeting all permit requirements.

Christine & Jeffery McCroskey	Has concerns about wildlife population in the area and tarps being disposed of in the landfill as an environmental hazard. Also mentions that the increase in size of the landfill will bring more traffic, smell and ecologically unsound practices.	WDFW has reviewed the project area and determined no significant impacts to habitat. Plastics are an acceptable material. Waste inspection and acceptance procedures are discussed in Section 3.4 of permit application. The expansion will maintain the current level of service and is not to market additional customers beyond population growth in the area	Staff and agencies conducted a site visit on 5/4/21. Staff received the following comment for WDFW regarding the site: "Thank you for setting up the site visit yesterday. As discussed this is an email summarizing the discussion regarding habitat impacts discussed. We reviewed the proposed site and WDFW determined that the clearing area was not currently in sagebrush habitat, with only a few scattered sagebrush occurring in the area. WDFW agrees that clearing of this area would not reduce sagebrush habitat on the site. It was also discussed for revegetation plans once the site is finished. WDFW would agree that the site should be replanted with a native grass mix for restoration once the site is no long being used. If not adding sagebrush to the native grass mix, WDFW would appreciate that the property at least allow sagebrush to natural recolonize the site. Thank you again for the opportunity to resolve this habitat issue." Tarps appear to be allowed in Limited Purpose Landfills under WAC 173-350-100.
William Riordan & Heather Powell	Has concerns about smells from the landfill and silage facility.	The proposed is for the expansion of the existing limited purpose landfill. Limited Purpose Landfills are generally inert and typically do not generate significant odor, as discussed in Section 3.6.4 of the permit application.	Limited Purpose Landfills generally do not produce significant odor due to accepted wastes. The applicant has provided ways to reduce odor from the landfill in Section 3.6.4 of the permit application.
Nancy & Jim Harry	Has concerns about property values, groundwater contamination and geology in the area as well	County has been disposing of solid waste at this site since 1980. The landfill meets the location standards as discussed in Section 2 of permit application. County currently pays for ongoing groundwater monitoring performed at the site. It is performed in accordance with Groundwater Sampling and Analysis Plan in Appendix D of permit application	The proposed landfill is conditioned to meet all groundwater requirements in WAC 173-350-500.

