



COMMUNITY DEVELOPMENT SERVICES  
KITTITAS COUNTY  
411 RUBY ST., SUITE 2  
ELLENSBURG, WA 98926

RE: [CU-21-00003](#)

DEAR STAFF:

The Sage Hills development is located approximately 14 miles east of Ellensburg and 4 miles west and downstream of the County's Ryegrass landfill. Due to this location, the property owners here have real concerns regarding the proposed expansion of the landfill and the safety/potability of the groundwater and underlying aquifer which provide our well water.

If the county plans to proceed with consideration of the aforementioned conditional use permit for expansion of the Ryegrass limited purpose landfill, we bring these environmental issues related to the CUP application to your attention:

- 1) Much of central and eastern Kittitas County lies within the Yakima Fold & Thrust Belt<sup>1</sup> (YFTB) which puts those areas at higher risk for earthquakes related to YFTB movement along both thrust and sideslip faults. While there are currently no known faults directly below the Ryegrass landfill or its proposed expansion area, there are many nearby. Known and mapped faults<sup>2</sup> in the area include: #561a - Frenchman Hills Thrust Fault which lays east/west and terminates in Kittitas County north of Ryegrass landfill; and #562a - Saddle Mountain Thrust Fault which lays east/west and terminates in Kittitas County south of landfill. In addition to these faults which bracket the landfill,

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<sup>1</sup> Yakima Fold and Thrust Belt: [https://pubs.usgs.gov/sim/3212/sim3212\\_sheet.pdf](https://pubs.usgs.gov/sim/3212/sim3212_sheet.pdf)

<sup>2</sup> Faults and earthquakes in Washington State: [https://www.dnr.wa.gov/publications/ger\\_ofr2014-05\\_fault\\_earthquake\\_map.pdf](https://www.dnr.wa.gov/publications/ger_ofr2014-05_fault_earthquake_map.pdf)

there are several north/south-oriented side-slip faults, two of which are proximate to the Ryegrass landfill. These known faults are not typically the catastrophic type but how much movement is needed to allow contaminants from the landfill to reach the groundwater or aquifer?

2) As stated in the CUP permit application, the geology of eastern Kittitas County is primarily Columbia River Flood Basalts (CRFB), including the Ginkgo Flow. It is our understanding that the original Ryegrass landfill was closed by DOE in the 90's due to contamination of the underlying ground water/aquifer and this contamination was greatly aided by the nature of the underlying fractured CRFB rocks layers. Indeed, a CWU (now emeritus) professor of geology testified at the time that the Ryegrass area is the absolute worst location of any landfill due to the fracturing of the underlying basalt layers. This casts doubt into the CUP's assertion in section 2.9.2, that contaminants would take 200 years to reach underlying water.

- This CUP also relies on a 2004 SEPA which admits waste materials could enter ground or surface water and relies on "natural soil foundation layer" to attenuate percolated rainwater.

3) To prevent illegal dumping, the CUP states there is a lockable entry gate which appropriately manages access to the landfill. While this is true, there is also a secondary gate located in the barbed wire fence line about 100yds east of the main entry gate which is frequently left open and/or unlocked and untended when the landfill is closed.

4) In section 3.3 of the CUP, the types of waste acceptable in a limited purpose landfill (LPL) include appliances. There is nothing in this section that addresses whether appliances must have toxic substances such as used oil, mercury, or refrigerant HFC-134a (1,1,1,2-tetrafluoroethane), removed prior to dumping. Will the County require commercial customers to follow the EPA's responsible appliance disposal program (RAD)<sup>3</sup> in order to be allowed to dump appliances in the landfill or will it simply accept all appliances, toxic substances notwithstanding?

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<sup>3</sup> Environmental Protection Agency RAD program: <https://www.epa.gov/rad>

5) There are several threatened or sensitive plant species in the area, including *Astragalus* species such as Palouse milkvetch, pauper milkvetch, *Cryptantha leucophaea*, *Pediocactus nigrispinus*, and more. Relying on a 2004 SEPA when these plants could have spread throughout the proposed landfill expansion area in the intervening 17 years is short-sighted and irresponsible. A new SEPA is called for.

The greater issue here is whether the County will ever close this inappropriately sited landfill as it should. In 2004, when the County filed to make the Ryegrass landfill an LPL, it stated the landfill would be closed in 2021. Yet instead of closing it, the County plans to expand it. We strongly urge Kittitas County Commissioners to close this site and instead develop commercial dumping fees for use at current transfer sites.

For these reasons, the Sage Hills II Homeowners, Inc., Board feels it is premature to approve the conditional use permit as filed. Please deny CU-21-00003 as insufficient, inadequate, and incomplete.

Sincerely,

*Charli Sorenson*, President  
Sage Hills II Homeowners Association