



PUBLIC HEARING: RYEGRASS EXPANSION
TESTIMONY
KITTITAS COUNTY HEARING EXAMINER
KITTITAS COUNTY CDS STAFF

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.

In our original comments to this CUP, we cited scientific articles showing the area is in what is called the Yakima Fold & Thrust Belt.

- 1) Much of central and eastern Kittitas County lies within the Yakima Fold & Thrust Belt¹ (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 faults² 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, there are several north/south-oriented side-slip faults, two of which are

¹ Yakima Fold and Thrust Belt: https://pubs.usgs.gov/sim/3212/sim3212_sheet.pdf

² Faults and earthquakes in Washington State: https://www.dnr.wa.gov/publications/ger_ofr2014-05_fault_earthquake_map.pdf

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?

Please note that the above articles are relatively new, published within within 10 years. In response, County experts cite science from 1994. Recent scientific papers indicate the YFTB is currently active and moving resulting in continued fracturing of underlying basalt.

In response to our concerns regarding possible groundwater contamination (see below)

2) As stated in the CUP permit application, the geology of eastern Kittitas County is primarily Columbia Rive 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.

County experts state the LPL location is ideal because of the low rainfall (citing 8" or less annually). These conditions presumably existed while the County operated the municipal landfill at the site from 1980-1998 when leachate from the landfill catastrophically contaminated surrounding surface and ground water, resulting in the closing of the municipal landfill by DOE. If the prior landfill managed to contaminate surface and ground

water under the exact same soil and rainfall conditions in less than 25 years, the County's contention that low rainfall and soil conditions would offer 200-year buffer from LPL runoff reaching the groundwater must be seen as ludicrously optimistic at best and willfully blind at worst.

The Ryegrass LPL is surrounded by disappearing sagebrush steppe. As pointed out in original comments to the CUP, this includes rare and threatened species.

3) 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 County's response was to cite WDFW email which says there is no significant impact to habitat. Please review the attached photos from google earth ranging from 1985 to current. It is immediately obvious that the county has been repeatedly clearing the land and removing native plants as they recolonize the area. This activity also belies the County's dedication to saving the shrub steppe.

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









