



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

July 11, 2019

Jeremy Johnston
Kittitas County Community Development
411 N. Ruby St., Suite 2
Ellensburg, WA 98926

Re: SE-19-00006

Dear Jeremy Johnston:

Thank you for the opportunity to comment on the mitigated determination of nonsignificance to obtain a solid waste piles permit for an existing top soil and mulch facility, proposed by Rob Forman. We have reviewed the documents and have the following comments.

AIR QUALITY

While an air permit for screening and soil piles is not required, installation and operation of any new or modified air pollutant source requires a preconstruction air quality permit, unless otherwise exempted. [Washington Administrative Code 173-400-110.] While composting is not mentioned in the SEPA checklist, note that composting or other biological processing may require an air permit. For additional information regarding air permit applicability and/or process, please contact **Ryan Vicente**, at 509-454-7899 or ryan.vicente@ecy.wa.gov.

WATER QUALITY

NUTRIENT AND BACTERIAL SOURCE CONTAINMENT: The Yakima River is listed for conditions of impairment, including high concentrations of nutrients and fecal coliform bacteria. Producing soils for land applications is an excellent use of manure, but can also create a concentrated source of nutrients and fecal coliform bacteria. A study to determine degree of nutrient content and algae/invasive plant growth is pending. Nutrients have been a concern in the Yakima River because of the fertilizing affect they have on aquatic plants and bacterial populations. Therefore, any source of nutrients and bacteria that can enter streams is of concern. Both concentrations may still be high enough to impair river waters if the stockpiled source becomes transported there. It is expected that harmful animal sources of fecal coliform bacteria would be naturally reduced by composting mulch. However, flood and stormwater impacts can transport both sources. Therefore, the recommendations here should be maintained throughout use of the property for mulch production.



Jeremy Johnston
July 11, 2019
Page 2

It is encouraging that the site already has a retention pond for ensuring surface waters stay onsite. Kittitas County is encouraged to compare the size of the pond to the actual need of the site during rainstorms and snow melt to ensure it is large enough under normal uses. Retaining mulch and its constituents onsite can ensure that this site will not be identified as a source of nutrients in future studies.

FLOOD AND STORMWATER MANAGEMENT: The SEPA checklist does address potential for flooding from adjacent properties with changes to berms in the area. Both MRM and Shaake sites have intact dikes at shoreline, but this may not be the only defense against flooding. The Yakima River is a very large and active river, which takes a 90-degree turn at the southeast corner of the MRM property, juxtaposed with the Shaake property. This is not a natural condition. Flow forces are directed into the dikes at the corner, and are forever working on surfaces there. The applicant and Kittitas County are both encouraged to ensure that composting sources either remain above flood datum in FIRM maps, or the mulch piles are protected with perimeter berms to prevent dilution of concentrated nutrients in the event of a breakthrough in the River dikes.

BUFFERING RIVER AND LAND USES: The existing dike on the south property line is excellently stabilized by trees and shrubs, and appears to provide a healthy riparian buffer between the river and land uses. Preparation of extended buffers along MRM's east property line with similar density of trees and shrubs would provide stable protection not only for the river, but also protect MRM property and mulching piles from flood exposure if flood management in the area changes or if a flood breakthrough occurs. The applicant is encouraged to check with Kittitas County on future plans for resolving flood force problems at the River's 90-degree turn.

If there are any questions about these comments, please contact **Laine Young** at 509-731-0911. I can also be reached at laine.young@ecy.wa.gov.

Sincerely,



Gwen Clear
Environmental Review Coordinator
Central Regional Office
(509) 575-2012
crosepacordinator@ecy.wa.gov