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AUG 05 2008
KITTITAS COUNTY
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Kittitas County Planning Commission
c/o Community Development Services
411 N. Ruby Suite 2
Ellensburg, Washington 98926

August 5, 2008

Re: Black Gold PUD Rezone (Z-08-07) and Black Gold PUD Phase 1 Short Plat (SP-08-28)

Dear Planning Commissioners,

There are several issues that need to be examined when considering whether to recommend approval or denial of this project:

1. ***Water availability***
2. ***Air pollution***
3. ***Sewage treatment***
4. ***Erosion, water runoff and environmental health***
5. ***Traffic and noise***
6. ***Fire and other emergency services***
7. ***Over-development and population***

1. ***The availability of potable water*** to service the number of units and people that are proposed for this development is of first importance.

In the SEPA checklist they tell you that the project will be serviced by a Group A water system. They say that the system is dependent upon the future purchase of water rights that will allow them to supply water beyond the 5000 gallons per day allowed from an exempt well. Is the applicant aware that a development of this size has no other option than a Group A system?

Water rights are a precious commodity today and are not to be easily found for reasonable prices. It is doubtful that they will be able to secure water rights at a price that will make 286 units, including 80 "affordable" apartments, a feasible investment. If water rights are found they will prove difficult and time consuming to transfer. ***Confirmed water availability and the ability to deliver it should be of prime importance before any application proceeds.*** Maybe they should have a conversation with Suncadia, Roslyn and their lawyers regarding the purchasing and transferring water rights since it appears that they are ignorant of the water issues in this basin.

2. ***Air Pollution.*** The application addresses emissions from construction work and after the construction phase is complete, emissions from auto exhaust and wood smoke from fire places, etc. They neglect to mention the fact that the sand filter that treats the water the people of Roslyn and Ronald drink is an open system. They have conveniently forgotten that their previous excavation of the #3 mine slag pile covered the sand filter with dust and contaminated dirt that required an extensive and expensive cleanup by the Roslyn City staff. There is no reason to believe that the water relied on by several hundred people will not be contaminated again. They have also conveniently omitted the location of the filter plant and storage tanks from their many maps.

They say that they will consult with DOE for air control requirements such as the development of a fugitive dust control plan. There is no workable plan that I know of that will keep wind driven debris from getting into the water filter.

3. ***Sewage treatment.*** In the SEPA Checklist they state: ***“The project will be served by septic systems OF an on site reclaimed wastewater treatment plant as approved.....”*** and ***“.....if used the reclaimed water treatment plant will treat water to a high standard approved by the state for non-potable water re-use”.*** (emphasis mine).

What possible re-use could there be except for some irrigation of lawns and flower beds. There will be no livestock to water (see page 3 on the “objectionable things” that will not be allowed in the PUD). The vast majority of the treated effluent generated by the predicted 672 people (see 8(j)) will have to be discharged someplace. If it goes into the ditches, etc. it will end up passing through Suncadia Resort and other private property below the development. There is no other place to direct the effluent except for the same place that storm water and snow melt water is directed.

A community septic system is also mentioned as a possibility for sewer treatment. There is no mention of where the system will be located. Phase 1 of the project abuts the limits of the township of Ronald. It is above the town on the hillside and will contain 80 “affordable” apartments as well as other multi family structures. There is no plan given for sewage treatment for this Phase nor is any location of a community septic system mentioned except in very general terms. The people of Ronald do not want effluent from this project seeping down hill into their basements, gardens or streets.

4. ***Erosion, environmental health and water runoff.*** The applicant claims that seasonal precipitation typically infiltrates the ground or is managed by existing management practices. They also claim that no environmental health hazards are anticipated.

Because the slopes are steep very little water infiltrates the ground. The existing management practices are in place with no thanks to the proponents of this project. They have been in place for years before the property was acquired by the developer. Snow melt in the spring, for the most part, flows through existing ditches into the old Ronald sewage lagoon which now serves as a catch basin for most of the runoff from the hills above Ronald. It also follows a ditch system along the old railroad right of way and a dry creek bed eventually onto Suncadia Resort property after passing through properties belonging to Ronald residents.

They claim reduction of impacts from runoff will be accomplished by straw bales, silt fencing and perhaps a sediment pond. There is not a straw bale existing that can control the snow melt runoff in the spring. Especially after a winter like 2007-08. A sediment pond would have to cover about two acres and be 25 feet deep to slow the flow of the runoff. Will this pond be located on the hills above Ronald beside the community septic system? Evidently the underground coal fire that startled residents of Roslyn and Ronald not long ago have been forgotten. The area around the number 3 mine and phase 1 of this project is saturated with coal waste and dust.

A fire, whether intentional or otherwise, could possibly start another coal fire going underground with dangerous consequences. The last fire was not anticipated either.

5. ***Traffic and noise.***

They state that the property in the proposal experiences little traffic noise. What about the land outside and abutting the property? This development at build-out is predicted to generate up to **2860** vehicle trips per day (see 14(b)(f)). Add to this number the predicted traffic from two other applications for projects within one mile of this one and the number soars to **7500**. That's up to **SEVEN THOUSAND FIVE HUNDRED** vehicles per day going through Ronald and Roslyn on a two lane highway. The 25 MPH speed limit is largely ignored by drivers from the west side who are here to recreate and are undeterred by signs and encouraged by the lack of police presence (this unfortunately applies to some locals too). This is in addition to the traffic that is now being experienced here.

Noise pollution is sure to be a problem. They intend to work from 6:00 AM to 8:00 PM, six days a week. The people of Ronald will be subject to construction noise from "Dawn to Dusk" for six days running with all the associated traffic, dust and probable contamination of their drinking water. . If the traffic and noise doesn't drive out the established residents, the tax increases surely will.

6. ***Fire and Emergency Services.***

Again, as on numerous other occasions, we bring up the impact on the fire, police and other emergency services.

As more people move into rural and forested areas the possibility of forest fires increases. The land within and surrounding the proposed Black Gold project is susceptible to fire. Yet they will only "encourage" the buyers of their land to implement appropriate "fire wise" management techniques when they should be required as part of the covenants they will establish.

Fire District #6; Kittitas County Sheriffs Dept; Kitcom; Local medical facilities; Kittitas County Environmental health; Washington State DOE. These are all services that this and other proposed projects call on for support. The county government has yet to require impact fees on developers to offset the costs to the taxpayers of the county who will end up paying the bill.

7. ***Over-development and population.*** This applicant uses the other plats and PUD's as justification for his project.

How many developments are needed in the immediate Roslyn/Ronald area? There is "***Evergreen Valley Plat***"; "***Cle Elum River Trails PUD***" (for which a application has been filed to expand by another 44 acres); "***Evergreen Ridge PUD***"; "***The Village at Roslyn Ridge***"; the proposed "***Ronald PUD***" (90 acres, which will abut The Village) and now the "***Black Gold PUD***". This will total six (6) developments within a one mile circle drawn from the center of Ronald and does not include Phase 2 of the Suncadia Resort which abuts the west limits of Ronald and Pine Loch Sun III.

How many persons are living in the Village at Roslyn Ridge, Evergreen Valley Plat, Evergreen Ridge and Cle Elum River Trails? We don't know and I doubt that the County knows. What ever the number, if the Black Gold PUD, The Ronald PUD and the expansion of the Cle Elum River Trails PUD is allowed there will be over 1500 *more* people added to this unknown number.

The Kittitas County Conference of Governments has adopted the Office of Financial Managements high population projection for the county. The number allotted to the Rural areas of the county is below *15,000* over the next 20 years. Does the county intend to place them all in the Roslyn/Ronald area?

In conclusion:

In 2005 the KCCOG (COG) appointed a committee of residents concerned with growth to adopt a vision plan for the upper county. Eighteen citizens labored long and hard to accomplish the task given them. The vision plan states:

“Citizens of Kittitas County recognize that growth will occur but proposed developments must demonstrate responsible, well planned growth that will balance the needs of existing residents with those of new development” and “New growth should have a tangible connection to local histories and traditions” and “a solid sense of community”.

The great shame of the county is that the government has paid but passing lip service to the Vision Plan and has for the most part ignored it's existence.

Black Gold PUD does not fit the vision plan.

We ask that you recommend denial of this project to the Board of County Commissioners.

Thank You,

Handwritten signatures of James Boyle and Juliana Boyle in cursive script.

Mr. And Mrs. James Boyle
P.O. Box 39 - 381 Third Street
Ronald, WA 98940