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Kittitas County CDS

Today I am adding comments to the record regarding 3BR custom cuts slaughterhouse/feedlot project. In this document I will be detailing comments regarding the letter for mitigation plan and the most current SEPA.

I have also attached all my previous comments since they pertain to the current application just as much as they did before and show how this project has a history of being erratic.

Also attached are some pictures taken from Wilson Creek Road from the floods that occurred first week in May 2023. They demonstrate the flooding around the well head area and the high surface water level of the project site.

This property has always been prone to flooding and now it is even worse with all the excavations from trenching that occurred. The current stock well that is being proposed for a Class B community well had flood waters within the 100-foot sanitary radius for weeks during this flooding. This flooding will keep occurring every year just as it has historically, moving ahead it will be worse since trenching from the back of the property which is next to Lyle creek has created an easy conduit for water to travel from the East end of the property to the West end where the current well is and flooding occurs.

Thank you for your time in reviewing these comments.

Thank You  
Jeremy Bach

## **Comments on water, offal and inedible product mitigation plan for 3BR custom cuts.**

**Wastewater** section does not detail how the slaughterhouse/feedlot will capture all contaminants from getting onto the ground/soil and then contaminate the surface water. The surface water on that lot is extremely shallow as it shows in many pictures when trenching was taking place a few weeks ago. That contamination would go directly into the surface water and runoff into neighboring lots and the Wilson Creek ditch. Slaughterhouse/feedlots have high concentration levels of animals in a very small area thus creating a high concentration of contaminants. These concentration levels have not ever existed historically on this property and in a residential neighborhood with shallow wells the potential for contaminants getting into the surface water system go up a great deal with this slaughterhouse/feedlot project.

**Fat & Liquid Fats** section talked about, *“Liquid fat will be present during cooking operations.”* To me this sounds like a great way to produce an un-natural smell that will permeate throughout the area and create downwind air emissions. There is no detail how they will mitigate these fat cooking emissions that 3BR custom cuts will produce. Everyone that’s from Kittitas County knows the smell that Shockey’s produced, only difference is that this time it’s in a developed residential area. The smell of cooking off liquid fat as the mitigation plan details is not a natural or normal smell to the area. It doesn’t smell like it now and after the slaughterhouse/feedlot project it will smell like it.

**Manure** section says that *“trace amounts of manure may enter the wastewater system.”* Normal septic systems are not meant to handle manure or any other trace amounts of contamination created from a slaughterhouse/feedlot. This seems to be a vague plan for a, “state-of-the art” facility.

## **COMMENTS ON (REVISED) SEPA APPLICATION FROM 4-4-23**

### **#2 AIR**

As mentioned in above comments the slaughterhouse/feedlots mitigation letter talks about cooking off fats. But in the new SEPA it doesn't address this and simply says no measures to control this new smell of fat cooking from their facility. This needs to be clear, ignoring the proper air and emissions requirements is not an answer.

The residential neighborhood surrounding the facility will have their public health and safety greatly impacted.

Everyone that has lived here knows about our inversion layers we get throughout the winter and burn bans that get announced due to air quality.

How will the air pollution created from this facility play a role in wintertime air quality?

### **#3 WATER**

This property is extremely flood prone and floods every year. This year in the first few weeks of May this was demonstrated.

The location of the current stock-well that is proposed to be a community well have flood waters within the 100-foot sanitary radius for weeks. During this time of flooding trenching/excavations were done thus creating easier pathways for floodwaters to reach neighboring properties and allowing their stormwater runoff to go into the Wilson Creek ditch and neighboring properties.

The amount of water contamination that could have occurred if this facility was operational during this year's floods would have been catastrophic.

Does the applicant have a bond requirement that would cover these environmental impacts when they occur?

They have no plan to control their stormwater runoff, and the proposed community well is within 100 feet of surface/floodwaters. This along with the current trenching/excavations allowing more water to be introduced to the site this facility could not be built and meet requirements at its current proposed location.

## **#7 ENVIRONMENTAL HEALTH**

There is nothing in their mitigation letter or plan to deal with the high concentrations of phosphorus and nitrates that are created from slaughterhouse/feedlots. There is nothing addressing the highly concentrated amounts of animals in the holding pens and how their waste and runoff will be contained and disposed off.

The current site plan has the holding pens and facilities up gradient from the current stock well and flood area.

All the stormwater runoff, waste from the holding pens, and contaminated water from washdown facilities would have a great potential to drain towards the well and flood area draining into Wilson Creek ditch.

## **#14 TRANSPORTATION**

The applicant states that there will be 40 vehicular trips per day and there will be no mitigation measures taken to address this impact.

Wilson Creek Road is an extremely busy road and getting busier due to being in a residential area. Residential areas have many families with kids and school bus activity. Not only Wilson Creek Road will see increase in traffic demand but Kittitas Highway and Vantage Highways and all other routes north and south of the facility.

The applicant should do a full transportation study and really acknowledge the fact that their slaughterhouse/feedlot will put traffic over the top on this half of the Kittitas Valley and place an undue burden on families who live and use the roads.





**May 9, 2023**  
**CU-23-0001**

**Water to Well Head. Livestock in proposed site.**  
**Surface**

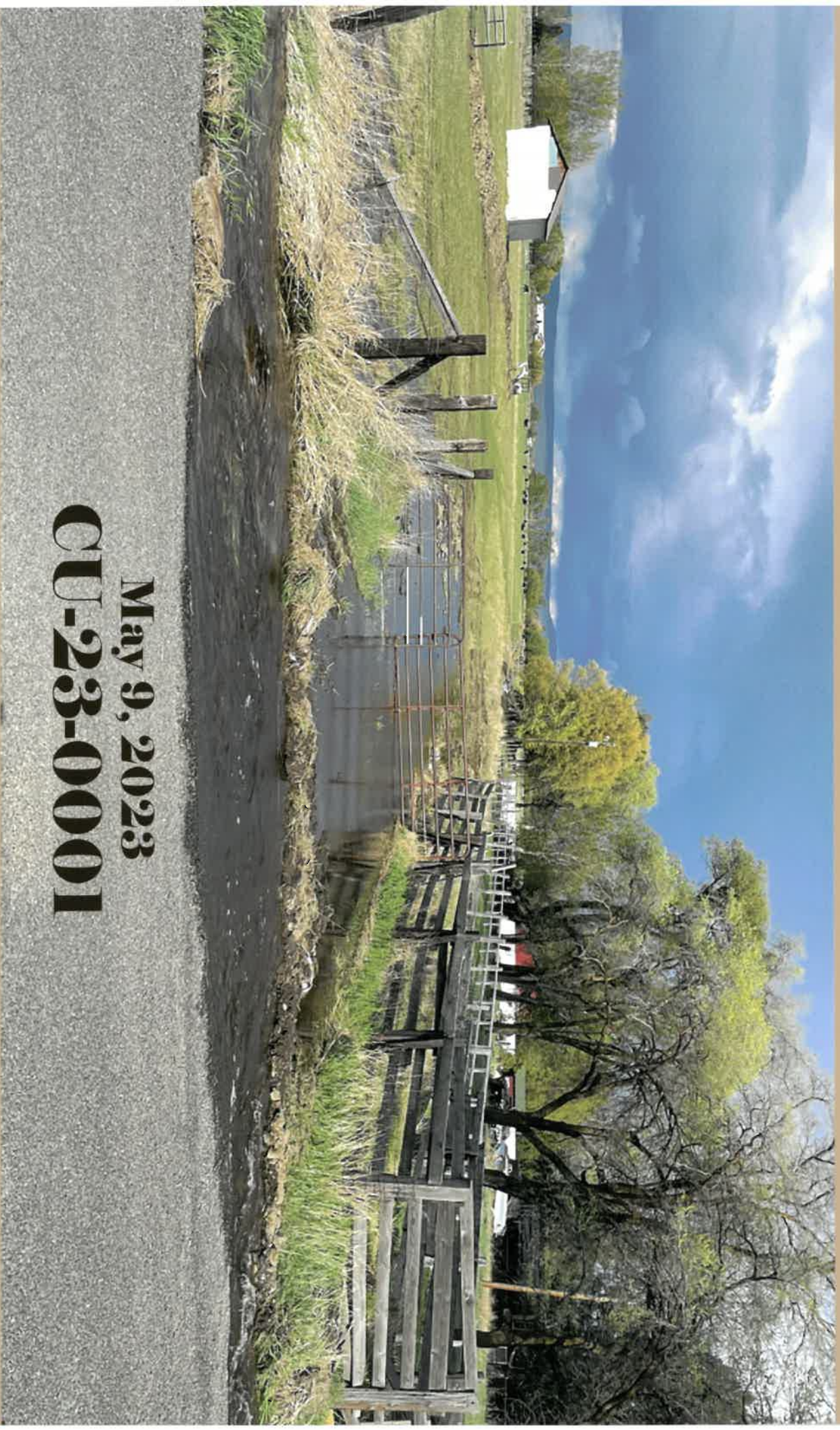




**May 9, 2023**  
**CU-23-0001**

**Surface** water to Well Head. Livestock in proposed site.





**May 9, 2023**

**CU-23-0001**

**From Wilson Creek Road**





**Corner of Wilson Creek Road and Lyons Road**

**May 9, 2023**





Previous  
Application  
Comments

Jeremy Bach

3410 Wilson Creek Road

Ellensburg Wa 98926

I am commenting and have questions regarding 3 Boots Ranch permit #(CU-23-00001) project proposed at 3200 Wilson Creek Road.

Me and my family live at 3410 Wilson Creek Road which is upwind from the proposed commercial slaughterhouse/meat processing plant. I have lived in the surrounding area for 42+ years, this part of Wilson Creek Road is mostly residential housing neighborhoods and farmland, no commercial slaughterhouse/meat processing plants are anywhere close to the proposed area of 3200 Wilson Creek.

I believe this type of project is a need in our community, but its location would negatively impact all surrounding property values, there are numerous studies showing this impact. People do not seek out to buy property next to commercial slaughterhouse/meat-processing facilities. There is no mitigation in 3 Boots Ranch's permits regarding the noise, smell, extra traffic, and run off that this project would create.

The name on the SEPA application of 3 Boots Ranch Custom Cuts isn't even the same one on the permit of CU23-00001 which is 3 Boots Ranch. How can you have 2 separate business names on the same project, one on the permit and a different one on the SEPA application?

With no plan to mitigate obvious impacts this project will be adding noise created from all the extra traffic and the 200 cattle dropped off per day would essentially create a feedlot that brings with it the impacts of odors, bugs, and extra run off to surface water.

These are not only public health, environmental health, neighborhood health, property value impacts, they are issues that have an overall negative impact on everyday life for those that will have to live around this commercial slaughterhouse/meat-processing facility.

The county should protect its current tax base, not just look to expand it at the cost of its long-time residents. Its bad county policy to take property values away from established residents.

Below are a list of comments/questions that will go into greater detail on the issues that this project creates for the neighborhood, if you have any follow-up questions, please do not hesitate to contact me.

Thank You

Jeremy Bach



## #1

This commercial slaughterhouse/meat processing facility will ultimately change the character of the surrounding neighborhood by not addressing the smell created from a facility like this. In their revised SEPA checklist the answers to all the questions pertaining to air/emissions are essentially no and none created.

There is no mitigation for the damage to surrounding property values, in no.4 under conditional uses listed below it does state that, "The proposed use will mitigate material impacts of the development, whether environmental or otherwise." Their proposed plan does not list how they mitigate for these property value impacts created from their development, in fact there is no mention that it even exists.

These points alone demonstrate why no.1 and no.4 of the counties review criteria are not being met. Since these county criteria cannot be met this project should not be authorized a conditional use.

Chapter 17.60A

### **CONDITIONAL USES**

#### **17.60A.015 Review criteria.**

The Director or Board, upon receiving a properly filed application or petition, may permit and authorize a conditional use when the following requirements have been met:

1. The proposed use is essential or desirable to the public convenience and not detrimental or injurious to the public health, peace, or safety or to the character of the surrounding neighborhood.
4. The proposed use will mitigate material impacts of the development, whether environmental or otherwise.

## **COMMENTS ON (REVISED) SEPA APPLICATION**

### **#2**

All commercial slaughterhouses/meat processing facilities produce odor, it's impossible not to especially in the summer when it gets hot, plus we do have wind in this valley, so everyone that is down wind in the summertime will have to endure with the odors created. There is no mitigation for this in their plan.

### **B. Environmental Elements (Answers from the SEPA checklist application on file)\*answers in italic**

#### **2.Air**

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

*Emissions from construction equipment during the construction phase. Once completed No Emissions.*

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

*None*

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

*No atypical emissions anticipated on site*

### **#3**

There is a ditch right next to Wilson Creek Road that the proposed project will be located. This ditch does flood from time to time especially during run-off time. Adding wash down facilities and slaughterhouse by-product water run-off to the grass field would add to possible flooding and excessive smell. In their SEPA checklist they answered no being next to this main ditch on Wilson Creek as you can see below.

### **3. Water (Answers from the SEPA checklist application on file)**

#### **a. Surface Water:**

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

*None*



2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No.

No. 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No

#### **#4**

With the volume of people expected to come in and out in a day the community water system should be a Class A system since it will be open to the public via bathroom facilities, ie: truck drivers, customers dropping off, customers buying, etc.

There wasn't a special septic or lagoon listed on the application regarding the disposal of animal waste, ie; waste from the slaughter house, wash-down areas, general contaminated water that is used from animal slaughter and processing carcass. Domestic sewages are not capable of handling high volumes of contaminated water and carcass waste created from a commercial slaughterhouse/meat processing facility.

I would hope that this gets addressed since it does impact public health and surface water run offs.

#### **b. Ground Water: (Answers from the SEPA checklist application on file)**

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

*There will be a class B Commercial well connected with this project. It will be mainly used for standard drinking water, bathrooms and hand wash locations. There will be occasional wash downs for cleaning of facilities. All water used will go into standard approved septic systems. Amount of use will vary per day but should be in the range of standard household use*

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

*Domestic sewage*

## #5

Once the hard surfaces, ie; asphalt etc., get added it will create more chance for contaminated water from the slaughterhouse to run-off down stream and get into the neighborhoods below of the main ditch next to Wilson Creek.

The SEPA application has no mitigation or measures to protect others from this contaminated slaughterhouse water run-off or from flowing into the main ditch that others downstream use.

### **c. Water runoff (including stormwater): (Answers from the SEPA checklist application on file)**

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

*The site is predominately farm ground pasture surrounding the facility. No storm runoff is anticipated to leave site.*

2) Could waste materials enter ground or surface waters? If so, generally describe.

*Not Anticipated. SEPA Environmental checklist (WAC 197-11-960) July 2016 Page 6 of 15*

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.  
*No.*

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

*None.*



## #6

There is no mitigation listed for the extra volumes of traffic that will be created once the project is completed. In the SEPA application under no.14 section F they answer that, “ **25 total vehicular trips a day with 80% employees too and from work and 200 cattle drop offs. No more than 6-8 Peak Hour Trips**”. That is a lot of traffic added to Wilson Creek Road in a residential neighborhood. 200 cattle drop offs could mean many things, 200 individual drop offs etc; not very clear. If there is 200 cattle dropped off in 1 day as it states in their SEPA application there will be a ton of noise and waste created from 200 cattle being stored and processed in 1 day. What happens if these 200 cattle don't get processed in the same day they arrive, does this turn into a feed lot?

### **b. Noise (Answers from the SEPA checklist application on file)**

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

*N/A- Same as a standard household- Occasional delivery trucks*

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

*ShortTerm: Heavy equipment and general construction noise along with vehicle traffic.*

*LongTerm: Vehicle Traffic and cattle noise generally during typical commercial business hours. Operating hours:*

*M-Th:6:00AM—4:30 PM*

## #7

There is no mitigation regarding the extra traffic created from this project. 25 vehicular trips could mean semi-trucks starting at 6am with 200 cattle drop offs per day. This is a major impact to everyone on Wilson Creek Road.

### **14. Transportation (Answers from the SEPA checklist application on file)**

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?

***25 total vehicular trips a day with 80% employees too and from work and 200 cattle drop offs. No more than 6-8 Peak Hour Trips***

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

*No.*

h. Proposed measures to reduce or control transportation impacts, if any:

*Non*

## **QUESTIONS**

1. How long will animals be housed at pens?

2. How many animals will be housed at the pens overnight?

3. Will the holding pens end up being feed lots housing cattle for a number of days?

4. What are the future plans on expanding size. Will there be any other projects or spin off projects attached or related to this one?

5. As of 2/21/23 there is two 3 BR Custom Cuts SEPA checklist on file with different answers pertaining to amounts of cattle delivered per day. Both the SEPA checklists posted for public view say they were filed 1/20/23 and both signed and dated 1/27/23? How can you file the same document the same day with different answers? Seems a bit misleading.

6. How much water are they mitigating for consumptive use and how much are they discharging to the surface waters? According to a paper, which is attached, they say the water use to cut and slaughter a cow is 150 gallons per-450 gallons per animal. If you take that water usage number and use the revised SEPA checklist answer of, "**25 total vehicular trips a day with 80% employees too and from work and 200 cattle drop offs. No more than 6-8 Peak Hour Trips**", this could put their daily gallons per day of use at 30,000 gallons per day-90,000 gallons per day, using their number of 200.