

2907 Harborview Dr., Suite D, Gig Harbor, WA 98335 Phone: (253) 514-8952 Fax: (253) 514-8954

Technical Memorandum

To: Chace Pedersen, Kittitas County

Date: January 25, 2024

From: Alex Murphy, Soundview Consultants LLC

Re: Response to Comments, Permit #CU-23-00006 Honest Cut Meats LLC Conditional Use Permit

Dear Mr. Pedersen,

Soundview Consultants LLC (SVC) has been assisting Scott and Necia Kay Shelton of Honest Cut Meats LLC (Applicant) with a Conditional Use Permit submittal for the proposed construction of a modular harvest component and modular drip cooler on a 54.48-acre site located at 15450 Vantage Highway in the Ellensburg area of unincorporated Kittitas County. This Technical Memorandum has been prepared in response to the County's Transmittal of Comments memo dated January 18, 2024. The comments are referenced below by the submitter and date, then followed by SVC's responses. The original comments are provided in their entirety in Attachment A.

1. Kittitas PUD; December 28, 2023

Response: No concerns noted; no response required.

2. Washington State Department of Transportation - Aviation; December 28, 2023

Response: No concerns noted; no response required.

3. Confederated Tribes of the Colville Reservation; January 2, 2024

Response: If required by the County, the Applicant will complete a cultural resources survey and prepare an inadvertent discovery plan. The subject property has been heavily disturbed by prior development activities and historic agricultural practices. No known cultural resources are present on the property.

4. Washington State Department of Fish and Wildlife; January 11, 2024

Response: WDFW noted multiple concerns, including applicability of the County's Voluntary Stewardship Program and critical areas requirements to the project, the proximity of proposed development to Park Creek (also called "Parke Creek"), recommendations to enhance the riparian corridor along Park Creek (a seasonal stream/drainage running through the property), and development within Park Creek's 100-year floodplain. As proposed, the project will comply with all Kittias County development requirements related to WDFW's concerns.

The applicability of the County's VSP and critical areas ordinance to the project is covered in SVC's 10/25/23 memo submitted with the initial Conditional Use Permit application package. During SVC's pre-submittal coordination for the project, SVC confirmed with Kittitas County Community Development and Kittitas County Conservation District (KCCD) staff that the VSP is applicable to the project under the existing agricultural activity qualification described in KCC 17A.01.030.3.

Enhancing the Park Creek riparian corridor or relocating the proposed development further away from Park Creek is beyond the scope of the proposed project, as it would significantly interfere with ongoing agricultural practices on the property. However, to minimize potential impacts from the proposed development on Park Creek, the Applicant will be constructing the holding pen on a new concrete pad and redirecting any waste generated from livestock in the holding pen away from Park Creek, into the proposed septic system or an upland composting facility in compliance with Kittitas County Public Health requirements. Waste generation will also be minimized by limiting the amount of time livestock is kept in the holding pen to 8-10 hours total per week. By constructing the holding pen in an area already used as livestock pens, these efforts will result in fewer impacts to Park Creek compared to current conditions.

Floodplain development requirements will be addressed through the County's floodplain development permit required by Kittitas County Public Works. No compensatory flood mitigation is proposed.

The Applicant is not opposed to future collaborative efforts to improve riparian functions along Park Creek with KCCD and WDFW, but those efforts are not proposed as part of this application.

5. Washington State Department of Ecology; January 12, 2024

Response: No new groundwater withdrawals will occur as part of the proposed project. The harvest module will use approximately 100-150 gallons of water per day, well below the exempt threshold of 5000 gallons per day, and will be sourced from an existing well on the property. Nathan Longoria, Permit Writer/Customer Service Specialist in Ecology's Yakima office, confirmed no further action is needed for the proposed development in a phone conversation on January 22, 2024.

6. Kittitas County Public Works; January 17, 2024

Response: Responses provided to individual sections below.

Access: No concerns noted; no response required.

Survey: No concerns noted; no response required.

Transportation Concurrency: The proposed development is expected to reduce daily traffic, not increase it. Current conditions have agricultural processing clients delivering carcasses and picking up processed goods on an individual, as needed basis. The proposed condition will eliminate individual deliveries and pick-ups, replacing them with bulk deliveries and pick-ups. Resulting traffic counts will decrease by 60-80% when compared to current conditions.

Flood: A floodplain development permit will be obtained as part of the building permit review process.

Water Mitigation/Metering: No concerns noted; no response required.

7. Kittitas County Public Health; January 17, 2024

Response: The new drain field has already received approval from Kittitas County Public Health under permit # 05-23-00184. Installation of the new system was completed under that permit in December 2023.

The Applicants and I appreciate this opportunity to respond. Please do not hesitate to contact us with any questions or concerns.

Sincerely,

Alex Murphy

Alex Murphy Senior Environmental Planner / Project Manager Office 253-514-8952 amurphy@soundviewconsultants.com

KITTITAS COUNTY COMMUNITY DEVELOPMENT SERVICES



411 N. Ruby St., Suite 2, Ellensburg, WA 98926 CDS@CO.KITTITAS.WA.US Office (509) 962-7506

"Building Partnerships - Building Communities"

January 18, 2024

Scott & Necia Kay Shelton 15450 Vantage Highway Ellensburg, WA 98926

Soundview Consultants LLC c/o Alex Murphy 122 East 1st St., Ste 4 Cle Elum, WA 98922

RE: CU-23-00006 Honest Cut Meats LLC- Transmittal of Comments

Dear applicants,

The comment period for CU-23-00006 Honest Cut Meats LLC, ended on January 17, 2024, at 5:00 pm. Community Development Services received the following comments:

- December 28, 2023 Kittitas PUD
- December 28, 2023
 Washington State Department of Transportation Aviation
- January 2, 2024 Confederated Tribes of the Colville Reservation
- January 11, 2024 Washington Department of Fish and Wildlife
- January 12, 2024
 Washington State Department of Ecology
- January 17, 2024
 Kittitas County Public Works
- January 17, 2024
 Kittitas County Public Health

If you wish to provide responses to any of the received comments, please do so by 5:00 pm on February 2, 2024, so that staff can incorporate and consider any of your responses into the staff report. For additional time to address any of the comments, please contact me directly to extend the response due date. If staff has not heard from you by February 2, 2024, we will proceed with processing the conditional use permit. If you have questions about any comments from an agency, please contact them directly.

For any questions regarding this matter, please contact me at (509) 962-7637, or by e-mail at <u>chace.pedersen@co.kittitas.wa.us</u>.

Sincerely,

Chace Pedersen Staff Planner

Enclosed: Comments listed above

From:	Ken Edwards
То:	Chace Pedersen
Subject:	RE: CU-23-00006 Honest Cut Meats LLC - Notice of Application
Date:	Thursday, December 28, 2023 10:42:30 AM
Attachments:	image001.png

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Chace,

Kittitas PUD has no comments.

Thanks,

Ken Edwards Engineering Manager PUD #1 of Kittitas County 1400 Vantage Highway Ellensburg, WA 98926 Phone: 509-933-7200 Ext 818 Ken.Edwards@KittitasPUD.com



From: Chace Pedersen <chace.pedersen@co.kittitas.wa.us> Sent: Thursday, December 28, 2023 8:32 AM

To: Dan Young <dan.young@co.kittitas.wa.us>; Marvin Douvier (SH) <marvin.douvier.sh@co.kittitas.wa.us>; Kim Dawson <kim.dawson@co.kittitas.wa.us>; George Long <long@kittcom.org>; storch@kittcom.org; Julie Kjorsvik <julie.kjorsvik@co.kittitas.wa.us>; Public Health Inspectors <PublicHealthInspectors@co.kittitas.wa.us>; Lisa Lawrence <kelee.hodges.pw@co.kittitas.wa.us>; Candie Leader <candie.leader@co.kittitas.wa.us>; Tate Mahre <tate.mahre@co.kittitas.wa.us>; Jackie Sharp <jackie.sharp@co.kittitas.wa.us>; Cameron Curtis <cameron.curtis@co.kittitas.wa.us>; enviroreview@yakama.com; Corrine Camuso <Corrine Camuso@Yakama.com>; Jessica Lally <Jessica Lally@Yakama.com>; noah oliver@yakama.com; Casey Barney <Casey Barney@Yakama.com>; kozi@yakamafishnsn.gov; matj@yakamafish-nsn.gov; Holly Barrick <barh@yakamafish-nsn.gov>; separegister@ecy.wa.gov; tebu461@ecy.wa.gov; lowh461@ECY.WA.GOV; FormerOrchards@ecy.wa.gov; wendy.neet@ecy.wa.gov; ECY RE CRO SEPA Coordinator <crosepa@ecy.wa.gov>; rand461@ecy.wa.gov; Downes, Scott G (DFW) <Scott.Downes@dfw.wa.gov>; Nelson, Jennifer L (DFW) <Jennifer.Nelson@dfw.wa.gov>; Torrey, Elizabeth M (DFW) <Elizabeth.Torrey@dfw.wa.gov>; DAHP SEPA (DAHP) <sepa@dahp.wa.gov>; jorgenja@cwu.edu; nelmsk@cwu.edu; Jeremy Larson <jeremy.larson@co.kittitas.wa.us>; Steph

From:	WSDOT Aviation Land Use Inquiries and Application Submittals	
To:	Chace Pedersen	
Subject:	RE: [EXTERNAL] CU-23-00006 Honest Cut Meats LLC - Notice of Application	
Date:	Thursday, December 28, 2023 2:16:13 PM	

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M Pedersen,

WSDOT Aviation Division reviewed the provided documentation on 12/28/2023. We have no comments.

Cheers,

David Ison, PhD | Aviation Planner Emerging Aviation Technologies & Land Use Compatibility Washington State Department of Transportation <u>david.ison@wsdot.wa.gov</u> C: 360-890-5258

From: Chace Pedersen <chace.pedersen@co.kittitas.wa.us>

Sent: Thursday, December 28, 2023 8:32 AM

To: Dan Young <dan.young@co.kittitas.wa.us>; Marvin Douvier (SH)

<marvin.douvier.sh@co.kittitas.wa.us>; Kim Dawson <kim.dawson@co.kittitas.wa.us>; George Long <long@kittcom.org>; storch@kittcom.org; Julie Kjorsvik <julie.kjorsvik@co.kittitas.wa.us>; Public Health Inspectors <PublicHealthInspectors@co.kittitas.wa.us>; Lisa Lawrence <lisa.lawrence@co.kittitas.wa.us>; Patti Stacey <patti.stacey@co.kittitas.wa.us>; Kelee Hodges

<kelee.hodges.pw@co.kittitas.wa.us>; Candie Leader <candie.leader@co.kittitas.wa.us>; Tate
Mahre <tate.mahre@co.kittitas.wa.us>; Jackie Sharp <jackie.sharp@co.kittitas.wa.us>; Cameron
Curtis <cameron.curtis@co.kittitas.wa.us>; enviroreview@yakama.com; Corrine Camuso
<Corrine_Camuso@Yakama.com>; Jessica Lally <Jessica_Lally@Yakama.com>;
noah_oliver@yakama.com; Casey Barney <Casey_Barney@Yakama.com>; kozj@yakamafishnsn.gov; Matthews, Jim <matj@yakamafish-nsn.gov>; Holly Barrick <barh@yakamafish-nsn.gov>;
separegister@ecy.wa.gov; Petropoulos, Terra (ECY) <tebu461@ECY.WA.GOV>; White, Lori (ECY)

<lowh461@ECY.WA.GOV>; FormerOrchards@ecy.wa.gov; wendy.neet@ecy.wa.gov; ECY RE CRO SEPA Coordinator <crosepa@ecy.wa.gov>; Anderson, Ryan (ECY) <rand461@ecy.wa.gov>; Downes, Scott G (DFW) <Scott.Downes@dfw.wa.gov>; Nelson, Jennifer L (DFW)

<Jennifer.Nelson@dfw.wa.gov>; Torrey, Elizabeth M (DFW) <Elizabeth.Torrey@dfw.wa.gov>; DAHP

From:	Connor Armi
To:	Chace Pedersen
Cc:	Guy Moura; Hanson, Sydney (DAHP)
Subject:	Re: CU-23-00006 Honest Cut Meats LLC - Notice of Application
Date:	Tuesday, January 2, 2024 10:29:03 AM

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Hello Chace,

This consultation is in response to CU-23-00006 Honest Cut Meats LLC. This undertaking is for a change over from Washington State inspection to USDA inspection. This requires a small footprint including a 8' by 40' harvest module, a 8' by 20' drip cooler, and a new 1200 gallon septic system and associated drain field.

CCT H/A requests a cultural resource survey prior to implementation and that there be an Inadvertent discovery plan in place prior to implementation, we will also look for DAHP concurrence on this request.

This undertaking is located within the CCT Traditional Territories. We request any undertakings, particularly those involving ground disturbing activities, to have an IDP in place prior to implementation.

The proposed project lies within the Traditional territory of the Moses-Columbia Tribe, 1 of the 12 constituent tribes of the Confederated Tribes of the Colville Reservation (CTCR), which is governed by the Colville Business Council (CBC). The CBC has delegated to the Tribal Historic Preservation Officer (THPO) the responsibility of representing the CTCR with regard to cultural resources management issues throughout the traditional territories of all of the constituent tribes under Resolution 1996-29. This area includes parts of eastern Washington, northeastern Oregon, the Palus territory in Idaho, and south-central British Columbia.

If ground disturbing activities are to be conducted, such as the clearing of land for residential construction, installation of a septic system or the installation of a driveway, creation of a concrete pad, a cultural resource surface survey and sub-surface testing of the area in and directly around the proposed ground disturbance are recommended as a surface observation will not be an accurate assessment of the existent potential for sub-surface cultural deposits. Please do so prior to ground disturbing activities. These tests should be to the terminal depth of the implementation to ensure the totality of the presence or absence of cultural material.

There are no known cultural resources of precontact and historic significance nearby, but this parcel is considered High to Very High Risk for an inadvertent discovery according to the DAHP predictive model.

CCT H/A requests a Cultural Resource Survey and further requests that during implementation there be an Inadvertent Discovery Plan or (IDP) in place to ensure compliance with all Section 106 and relevant cultural resource laws both federally and to the state of Washington.

Sincerely,

Connor Armi | Archaeologist Senior MA, RPA History/Archaeology Program Confederated Tribes of the Colville Reservation PO Box 150 | Nespelem, WA 99155 d: 509-634-2690 | c: 509-631-1131 connor.armi.hsy@colvilletribes.com

On Thu, Dec 28, 2023 at 8:32 AM Chace Pedersen <<u>chace.pedersen@co.kittitas.wa.us</u>> wrote:

Good morning,

CDS is requesting comment on the following conditional use application: CU-23-00006 Honest Cut Meats LLC. Links to the file materials can be found below. The comment period will end **January 17, 2024, at 5pm**. CDS will assume your agency does not wish to provide comment if not received by this date. Please let me know if you have any issues accessing the materials.

Internal Link: CU-23-00006 Honest Cut Meats LLC

External Link: CU-23-00006 Honest Cut Meats LLC

If the links above do not work, please go to the CDS website at:

https://www.co.kittitas.wa.us/cds/land-use/default.aspx and navigate to "Conditional Use", "View Active Applications", and then the project file number "CU-23-00006 Honest Cut Meats LLC".

Thank you,

Chace Pedersen

Planner I

Kittitas County Community Development Services

411 N. Ruby Street, Ste 2



State of Washington DEPARTMENT OF FISH AND WILDLIFE South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720 Telephone: (509) 575-2740 • Fax: (509) 575-2474

January 11, 2024

Chace Pedersen Community Development Services Kittitas County 411 N. Ruby Street, Suite 2 Ellensburg, WA 98926

SUBJECT: WDFW COMMENTS ON CU-23-00006 HONEST CUT MEATS

Dear Mr. Pedersen,

Thank you for the opportunity to comment on the proposed Conditional Use permit for the Honest Cut Meats project near Parke Creek. The Washington Department of Fish and Wildlife (WDFW) is familiar with this area and nearby critical areas, and we are active participants in the County's Voluntary Stewardship Program (VSP). We offer the following information for consideration to ensure Parke Creek, its floodplain, and the associated critical areas are protected if the expansion moves forward as proposed.

The use of prefabricated structures is likely to minimize the overall footprint and disturbance associated with the project, however there will be at least 480 square feet of new impervious surfaces near Parke Creek and a proposed holding pen that will likely send runoff toward Parke Creek. At least portions, if not all, of the development is within 100 feet from Parke Creek. The standard buffer width in the County's Critical Areas Ordinance would call for a 100-foot buffer plus a 15-foot setback. WDFW's guidance for riparian ecosystems in this location also recommends a 100-foot minimum setback to protect water quality. Ecology's <u>Voluntary Clean</u> <u>Water Guidance for Agriculture</u> recommends animal confinement areas (holding pens) be placed at least 150 feet away from streams in Eastern Washington and livestock exclusion of at least 100 feet to allow for a fully functioning riparian ecosystem.

There may be some gray area as to the applicability of the VSP to this proposal, but WDFW strongly encourages the applicants to include native woody riparian vegetation along Parke Creek to mitigate impacts from placing and operating these new facilities in close proximity to Parke Creek. Enhancing the riparian vegetation through this reach would help ensure the project does not degrade the water quality or Fish and Wildlife Habitat Conservation Areas on the property and would be consistent with <u>Kittitas County's VSP Approved Work Plan</u>. Establishing native woody vegetation along Parke Creek in this location may also help control the invasive reed canary grass that dominates the riparian area on this property.

The proposed prefabricated structures appear to be located near or within the 100-year floodplain as mapped by FEMA. Unmitigated placement of structures within the floodplain may result in

increased flood risks to existing structures and agricultural infrastructure. If compensatory flood mitigation is needed, WDFW recommends consideration of inset floodplain terraces adjacent to Parke Creek for effective flood mitigation and improved fish and wildlife habitat. We would be pleased to work with the applicants to further explore this option.

WDFW recommends a robust riparian establishment project be incorporated into the project proposal such that the project will be consistent with the goals for the local VSP work group. We welcome the opportunity to collaborate with the applicants and County to ensure this project will protect and enhance critical areas while also maintaining agricultural viability in Kittitas County.

Thank you again for the opportunity to comment and please let me know if there are any questions we can answer.

Sincerely,

Jenniper Nelson

Jennifer Nelson Fish and Wildlife Biologist Jennifer.Nelson@dfw.wa.gov (509) 961-6639



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

Central Region Office 1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

January 12, 2024

Chace Pedersen Kittitas County 411 N. Ruby St., Suite 2 Ellensburg, WA 98926

RE: CU-23-00006

Dear Chace Pedersen:

Thank you for the opportunity to comment on the Notice of Application for Honest Cut Meats LLC. We have reviewed the application and have the following comment.

Water Resources

Your project is located within the boundaries of WAC 173-539A so it may be subject to the rule. If you're planning on withdrawing groundwater for a new use within the boundaries of WAC 173-539A, your project must be water budget neutral. Before withdrawing or using any water please submit a *Request of Determination of Water Budget Neutrality* or an *Application for a New Water Right Permit*, depending on the size of your project either form may be required.

If you have any questions, please contact the Water Resources Customer Service line at 509-575-2597

Sincerely,

oy Espinoza

Joy Espinoza SEPA Coordinator Central Regional Office 509-379-3967 crosepacoordinator@ecy.wa.gov

202306017



KITTITAS COUNTY DEPARTMENT OF PUBLIC WORKS

MEMORANDUM

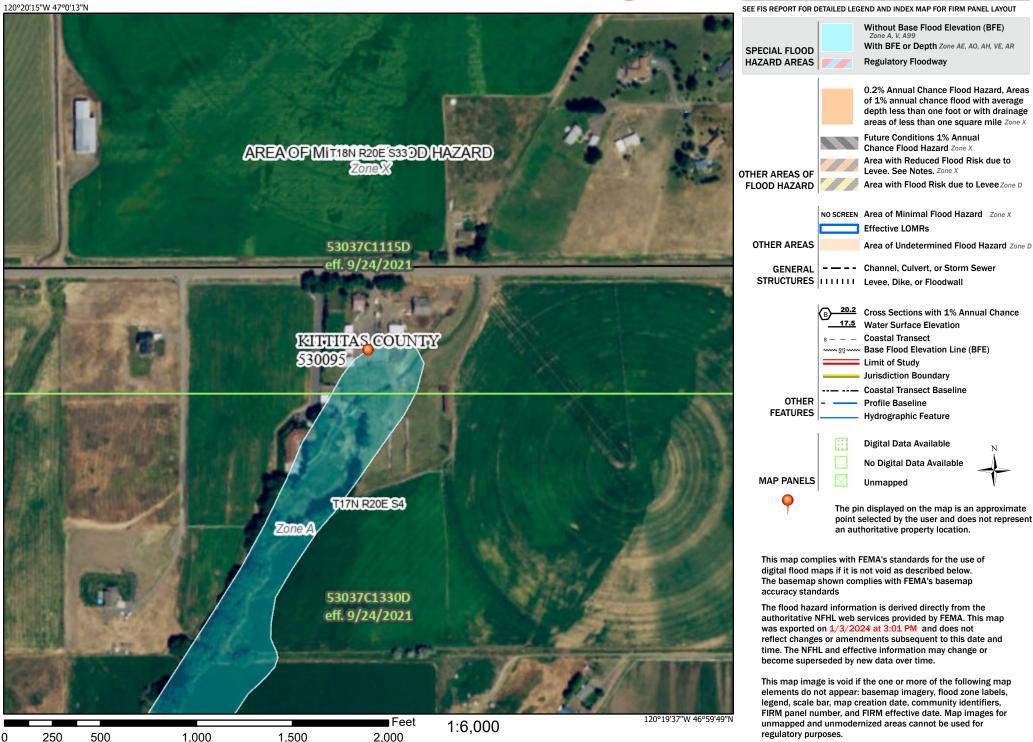
то:	All Staff
FROM:	Public Works Plan Review Team
DATE:	January 17th, 2024
SUBJECT:	CU-23-00006 Honest Cut Meats LLC

ACCESS	No access requirements, site plan shows existing access to be used. (JS)
ENGINEERING	Except as exempted in Section KCC 14.05.060, no grading or filling upon a site involving more than one hundred (100) cubic yards shall be performed without a grading permit from the County Engineer or Public Works designee (KCC 14.05.050). An application for grading in excess of five hundred (500) cubic yards shall be accompanied by an engineered grading plan (KCC 14.05.080).
SURVEY	There are no survey comments regarding this applications (JT)
TRANSPORTATION	Traffic Concurrency is required for all land use actions. A transportation impact
CONCURRENCY	analysis (TIA) shall be required for all development that will generate more than nine (9) peak hour vehicle trips. Please provide estimated traffic generation for peak hours to determine if a TIA will be required. (KCC 12.10.040(c)) (KAH)
FLOOD	The proposed project is located within zone A of the 100-year floodplain. All activities within the floodplain require a floodplain development permit. All construction, including structures that are exempt from a building permit, must follow the guidelines within KCC 14.08. Structures may be subject to mandatory flood insurance purchase requirements. For all walled and roofed structures in the 100-year floodplain, elevation certificates are required as part of the floodplain development permitting process. (SC)
WATER MITIGATION/ METERING	Water mitigation and metering requirements are not applicable to the proposed project as it will not exceed the existing permit exempt well allowance. The use will remain under 5000 gallons per day. (SC)

National Flood Hazard Layer FIRMette



Legend



Basemap Imagery Source: USGS National Map 2023



To Protect and Promote the Health and the Environment of the People of Kittitas County

January 17, 2024

Chace Pedersen, Planner I Community Development Services 411 N. Ruby Street Ellensburg, WA. 98926

Dear Chace,

The following comments are the Environmental Public Health comments on the CU-23-00006, Honest Cut Meats Notice of Application. A site evaluation will need to be performed to evaluate the soil in the proposed location of the new drainfield for the Harvest Module. The applicants will need to work with a licensed, on-site sewage designer to ensure that the new drainfield will be adequately sized and installed according to WAC 246-272A.

A plan of operation must be submitted to Kittitas County Public Health Department to determine if a permit or an exemption is needed for the compost generated by the proposed project.

Thank you for this opportunity to comment. If you have any questions, please don't hesitate to give me a call.

Sincerely,

Holly Erdman, B.S. Environmental Health Specialist II 509-962-7580



507 N. Nanum Street, St. 102 · Ellensburg, WA 98926 T: 509.962.7515 · F: 509.962.7581 www.co.kittitas.wa.us/health/