

To: Mackenzie Moynihan Staff Planner  
Kittitas County Development Services

June 17, 2008

From: James Repsher  
6252 Cove Road  
Ellensburg WA, 98926  
(509)607-9208

RECEIVED

JUN 19 2008

Kittitas County  
CDS

Re: B & J Preliminary Plat (LP-08-21) Craig Duncan – Applicant

Dear Ms. Moynihan,

Please include this letter as a written comment regarding the B&J Preliminary Plat (LP-08-21). I am an adjoining landowner to this parcel. I was disappointed to read that a finding of non-significance is expected. It is my feeling that this proposal represents a very significant environmental impact on a critical area of land. The cursory comments made by the applicant do not represent the true nature of the property involved or the impacts that this high density subdivision will have on the surrounding area.

Here is some history of this project. During the rezone there was a determination of non-significance as a non-project action. After written and oral comments were obtained, the Kittitas County Planning Commission recommended against the approval of the rezone from Ag-20 to Ag-3. The Board of County Commissioners ignored this advice and granted the rezone. The previous written and oral arguments against this high density project are still valid. Due to the potential impacts of this project I feel that it is likely to exceed the threshold for requirement of an Environmental Impact Study under SEPA.

Here are the specifics regarding the Environmental Elements as stated by the applicant.

**EARTH:** (1,c) Applicant states that the parcel's earth consists of "gravel and rock with a minimal amount of topsoil." In truth this area has a large area of quality soil and arable land. KRD maps and soil surveys plainly show this.

(1,g) Applicant states "minimal" land will be covered in asphalt or other hard surface. This proposed density will likely add seven large driveways and will likely require that the main private drive be paved per county code.

**AIR:** (2,a) Applicant states "does not apply." The construction of six additional dwellings will cause a large amount of diesel fumes and dust to be injected into the air. If there is no hard surface driveway, dust from the estimated seventy daily trips from this new subdivision will be a continuing problem. The applicant offers no suggestions for mitigation or dust control.

**WATER:** (3,a,1) The applicant lists "manastash creek and KRD Laterals" as surface water in this proposal. In truth there are no KRD laterals on this property. There is also a small, ephemeral, spring fed stream that has already been

illegally displaced, dredged and channeled by the applicant. There is a letter stating such by the Department of Ecology. This letter can be accessed in the written comments from the rezone.

(3,a,4) The entire ephemeral stream has been changed from its natural course.

(3,a,6) The applicant offers no mitigation for driveway or construction runoff. He is currently using the ephemeral stream as a drainage ditch into which all current driveway runoff flows.

(3,b,1) The applicant states that no ground water will be withdrawn. He has already drilled one well for his current residence. The other six residences will also require a water source. This aquifer is already stressed. The addition of six wells and lack of any other irrigation source will cause a severe impact to the surrounding water table.

(3,b,2) The applicant offers no mitigation for sewer services for this proposal. The addition of six septic systems in porous soil within close proximity to Manastash creek and an ephemeral stream has the potential to pollute the creeks and poison the surrounding domestic wells. This area is also an aquifer recharge zone. The increased number of septic tanks poses a threat to the aquifer.

(3,c,1) In regards to Water Runoff the applicant states is mitigation is "Natural Absorption." There is no mention of storm runoff control to keep runoff out of the ephemeral stream or Manastash Creek.

(3,c,2) Without a storm runoff mitigation plan residential waste could leach into the ground and surface waters.

(3,d) No mention is made for control of surface runoff that could be contaminated with fertilizers, insecticides or livestock manure.

**PLANTS:** (4,a) The applicant has not adequately completed this section. In addition to "sagebrush," a view of the lot from Cove Road will reveal Alder, Cottonwood and Aspen trees. Coniferous trees include Ponderosa Pines and Douglas firs. Shrubs include Squawberry, Elderberry and Wild Rose, Rabbit Brush and Service Berry. Several species of perennial grasses are present. There are also many plants common to Central Washington riparian areas along the creek. Wildflowers such as Lupine, Arrowleaf Balsam Root and Asters are present. Several species of noxious weeds are present in areas already disturbed by construction.

(4,b) Any construction will significantly alter this native habitat.

(4,d) Why does this "not apply?" The applicant should not be able to introduce any non-native or potentially invasive species.

**ANIMALS:** (5,a) In addition to the species of birds listed by the applicant, other species observed at the site include Great Horned Owls, migratory birds such as Western Tanagers and Grosbeaks and waterfowl such as Canada Geese and Ducks. In addition to "deer," fox, coyote, raccoon, ermine and ground squirrels have been observed transiting the property. Although Manastash Creek has been de-watered at times, it has been a historic salmon spawning stream that is currently undergoing restoration. Although I have not seen any anadromous fish in Manastash creek, I have seen brook trout.

(5,c) This property is one of the last open areas of riparian habitat along Manastash creek. As such many animals use it as a corridor. The riparian area offers cover and shelter for animals and birds moving through the Westside. The proposed density of this project and the proximity to the riparian zone of Manastash creek will close this important wildlife corridor.

(5,d) The applicant offers no form of mitigation for wildlife transit or habitat.

**ENVIRONMENTAL HEALTH:** (7,b,2) In addition to residential traffic. There will be considerable construction traffic and power equipment noise.

(7,b,3) The applicant offers no mitigation for residential or construction noise.

**LAND AND SHORELINE USE:** (8,a) Adjacent properties are also used for livestock grazing.

(8,b) The site in the proposal was used for livestock grazing as recent as three years ago.

(8,e) Although the property is currently zoned ag-3, this was not the recommendation of the planning commission.

(8,h) The riparian area surrounding Manastash creek is an environmentally sensitive area.

(8,j) Seven family residences at 4.5 people per residence equal 31.5 residents. Construction crews will be much larger. The applicant has provided no mitigation for construction crew needs such as toilet facilities.

(8,k,1) Ag-3 zoning is currently out of compliance with the rest of Washington State.

**AESTHETICS:** (10,b) The view from our property to the east will be substantially degraded by this proposal. This will cause a permanent decline in our property's value.

**LIGHT AND GLARE:** The applicant offers no mitigation for light pollution. The site is currently dark at night. The addition of six more residences will add significant light pollution to the area where none exists now.

TRANSPORTATION: (14,c) The applicant states that there will be two parking spaces per home. Does this include RV and Boat parking?

(14,f) Seventy vehicular trips per day represents a tremendous increase in the local traffic volume. This will permanently change the rural character of the surrounding area.

(14,g) The applicant offers no mitigation for traffic increase.

PUBLIC SERVICE: (15,a) The addition of 30+ people 5 miles from town will add to the burden of already stressed Fire, EMS and Police services.

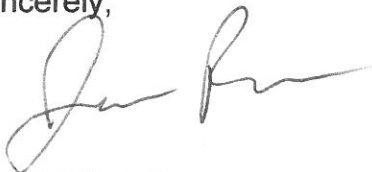
(15,b) The applicant offers no mitigation for increased impacts to public services.

UTILITIES: (16,a) In addition to the lack of a water supply and sewer, the applicant has no irrigation water distribution plan. As proposed, all irrigation water would have to come from a well. There is no access to KRD or other irrigation water at this site. The applicant should be required to prove the availability of irrigation water or prohibit the outside use of water at the proposed lots.

The high density of this proposal and the limited building areas on some of the lots after setbacks are considered may cause septic to well contamination between the future lot owners. A formal sewage system and/or drinking water distribution system may be required.

In conclusion, I feel that this proposal will exceed the threshold required for an EIS under SEPA. The applicant did a cursory and inaccurate job in completing his application. This proposal has the potential to cause significant environmental degradation to the applicant's land, the surrounding properties and an important wildlife corridor and riparian area. This proposal will also hinder the ongoing effort to restore a historic anadromous fish stream. I would also recommend a site visit before any determination is made. This proposal would drastically alter the surrounding neighborhood and rural character in which it is located. I would be happy to answer any questions or clarify any comments. Thank you for your consideration.

Sincerely,



James Repsher  
6251 Cove Road  
Ellensburg WA, 98926  
(509)607-9208