

Holly English
6251 Cove Rd.
Ellensburg, WA 98926

June 22, 2008

MacKenzie Moynihan
411 N.Ruby St., Suite 2
Ellensburg, WA 98926



RE: B & J Preliminary Plat (LP-08-21)

Dear Ms. Moynihan,

I writing to document the impacts I believe will result from the proposed B& J Preliminary Long Plat, in an effort to demonstrate that there are significant environmental impacts that will adversely affect the ecological and human community. Based on the overriding evidence, I believe the County should find a determination of significance for this project.

Prior to a SEPA determination, I believe the application should be returned to the applicant to be filled out thoroughly and with greater detail. Many of the questions are answered "n/a" or in 10 words or less. I feel there should be a greater burden on the applicant to demonstrate that there is no significant impact from their project than by demonstrating through lack of information.

Further, I would like to outline major concerns and issues. First and foremost, water is a major concern. The applicant will not be able to provide an adequate KRD water distribution plan as required. The result of platting without irrigation water will be 7 landowners irrigating off their wells and negatively impacting our area's aquifer. The impact the number of lots has on groundwater exceeds the environmental threshold and should be considered a significant impact.

To detail, the Duncan's are on the same lateral as their neighbors and myself. The physical infrastructure no longer exists for delivery of KRD water in this area. This fact was confirmed on site by KRD Board Member Larry Bland on June 16, 2008. The applicant falsely claimed during the zoning hearings that they had KRD water delivery. We recommend a site visit by County personnel to clear up this matter if there is any doubt as to the truth of this claim.

The only water currently being "delivered" is an ephemeral stream rerouted off the neighbors property and channeled via a ditch and culvert installed by the Duncan's in 2007. The stream originates from a spring on Dean and Pat Allen's property, and was

used historically by the Weaver homestead as a source of water. The spring water is considered surface water that is under jurisdiction of the Department of Ecology, as confirmed in a letter submitted and filed during the zoning proceedings. The Duncan's have no right to this surface water and in no way does the spring water connect to any KRD water or infrastructure. This was also confirmed in a letter from Department of Ecology and is contained in the zoning file.

Recommendations:

1. The applicant asserts that the land is comprised of rocks and weeds on the application. The applicant has 6 acres of irrigable land according to KRD soil maps. Since the applicant cannot satisfy his requirement to provide KRD a water distribution plan, he has the option of consolidating the six KRD water shares onto one 6-acre lot, and selling the other lots without KRD irrigation. The other option is to delay platting until the applicant can deliver KRD water to the property.
2. Wells: per the Campbell –Gwinn case, the entire project should fall under 1 exemption.
3. Reduce the overall density to 1 irrigable six-acre lot and 3 5-acre lots and require a group well.
4. The applicant should be required to have no-disturbance zones in the floodplain and riparian areas of Manastash Creek and a 25-foot setback from the DOE surface water. The applicant should be required to reseed and plant vegetation to prevent erosion along the driveway into the DOE surface water to maintain water quality.

MANASTASH CREEK

The US Fish and Wildlife Service have deemed Manastash Creek critical habitat for endangered steelhead. The creek is also designated 1 of 7 “usual and customary” fishing sites for Native Americans. The creek corridor also serves as an important wildlife corridor for native and migratory birds, ungulate species and small mammals not listed by the applicant. Due to the status of Manastash Creek as critical habitat under the ESA, and a restoration project of federal state, and local agencies, the project should be given a determination of significance and extra protections sought to protect this valuable resource. The applicant should be required to maintain a minimum 25 foot setback from the edge of the stream in order to protect vegetation that aids in shading the stream, maintaining water quality, and providing habitat and protective cover for wildlife. Covenants should be in place to require fencing off of livestock from the area, as well as other disturbances such as roads, off road vehicle use, structures, etc.

SOILS

The proposed project will result in a significant amount of soil disturbance and exceeds the threshold for environmental impacts. The applicant should be required to reduce the amount of disturbance by reducing the overall amount of density, require building envelopes, utilize no disturbance zones to the riparian/flood plain area of Manastash Creek to preserve the active wildlife corridor and water quality, and reseed after

disturbances to reduce weed infestations. In addition, the applicant should provide the County with an adequate erosion control plan.

LIGHTING

The proposed project will have a significant impact on the night sky and the rural quality of life, which includes stargazing and dark nights as confirmed in the County Comprehensive Plan. The overall density of the project should be reduced to a minimum of 5 acres to be in concert with the State Growth Management Act; no street lighting should be allowed, and the lighting permitted outside individual residences should be that which minimizes night glare.

SCREENING

The proposed project will have a significant visual impact on the neighborhood. The density should be reduced and landscaping, including trees, should be required along Cove Rd. and along the entrance road. Native vegetation that exists along Cove Rd. presently should be preserved to maintain screening.

ROADS and other County Services

The proposed project will have a significant impact to Cove Rd, as estimated in the nearly 70 trips per day indicated on the application. In order to maintain a rural character and reduce financial impacts to the County, reduce the density of this project. If the density is not reduced, then Cove Rd. is on the threshold of not being rural anymore, and the speed limit should be reduced to 35 mph between Hanson and Manastash Rd.

The applicant was supposed to demonstrate a benefit to the community in proposing this development. This added density would place a bigger burden on fire and EMS service, schools, and roads. These are all negative impacts unless the applicant can offer mitigation. Again, the recommendation is to find a determination of significance.

PROTECTIVE COVENANTS

The applicant should be required to place covenants restricting mobile and manufactured homes, and RV parking in order to maintain the character of the neighborhood. There are a number of historic homesteads and homes in this corner of the county which adds to the unique character of the Westside.

FINAL RECOMMENDATION:

Based on the following impacts, the County should recommend a determination of significance, and require the applicant to provide more detailed information on how the impacts will be eliminated or reduced. A preferred density strategy would be 1 six-acre lot consolidating the six irrigable acres, and three 5-acre lots, with protective buffers for the Manastash Creek riparian corridor and the ephemeral stream.

Respectfully submitted,

Holly English