

City of Cle Elum
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July 2, 2018

Kittitas County
Community Development Services
Attn: Chelsea Benner
411 N Ruby St. Ste 2
Ellensburg, WA 98926



RE: Kittitas County Upper County Shop Relocation – SEPA Comments

Dear Ms. Benner:

Below are the City of Cle Elum comments on the SEPA package for the Upper County Shop Relocation project (PF-18-00001). Some of the comments may already be included in your design, so forgive our redundancy if that is the case.

- **1. Earth**
 - **g. Proposed measures to reduce or control erosion...**
 - Please replant any disturbed areas with native vegetation at a density and configuration that is in keeping with Fire Wise and Fire Adapted principles.
- **2. Air**
 - **a. emissions**
 - Please monitor wind erosion during site preparation and construction to minimize impacts to SR 903, the Coal Mines Trail, and downwind public facilities and private communities.
 - Water is not the only wind erosion BMP, therefore, please have a backup plan for wind erosion/dust control.
 - Is the County proposing backup diesel generators? If so, the Department of Ecology requires an air quality permit.
 - The SEPA checklist states: “Once construction of the shop facility is complete, on-going operations associated with maintenance will continue. This includes typical emissions from heavy equipment at the site.”
 - What does “typical emissions from heavy equipment” entail? What are the impacts to air quality and neighboring properties, namely the traveling public, the transfer station, and most importantly the Cle Elum – Roslyn School District (CERSD) campus?

- Should “rock crushing or gravel production” take place onsite, what are the ongoing measures to avoid, minimize, or mitigate impacts to air quality and impacts to neighboring properties, in particular the CERSD campus?
 - Has there been an air quality study completed that identifies potential impacted groups and properties? For example, will the CERSD campus receive dust? Will they receive fumes from asphalt production?
- **3. Water**
 - **b. Groundwater**
 - 1) Does the project propose stormwater or process water being discharged to Crystal Creek once treated?
 - 2) The answer discusses only a septic system. Does the project intend to utilize/hook up to the City of Cle Elum municipal waste water system?
 - **c. Water runoff**
 - Please provide the City with a copy of the de-icing/anti-icing MSDS documents related to chemicals stored onsite and planned containment methods. What is the full containment that is planned to “prevent discharge to ground or surface water”?
 - Has there been an analysis to determine distance to groundwater?
 - Please describe what containment measures are planned to prevent underground spills from subsurface fuel storage.
 - Please describe what containment measures are planned to prevent above ground spills at the fuel station.
- **4. Plants**
 - Please use “Fire Wise” and “Fire Adapted Communities” initiatives guidance for vegetation management to prepare and maintain the site and prevent the spread of fire through the property.
- **7. Environmental Health**
 - **a. 4) Proposed measures to reduce or control environmental health hazards, if any.**
 - The answer: “Standard safety practices will be used, similar to those in use at the existing Maintenance Facility” may not cover the proposal, since the new facility may include practices that are not included at the current facility in Cle Elum. For example, the new facility has asphalt batching and a fuel station that are not currently included at the City location.
 - How is the County proposing to reduce or control environmental health hazards at this location and for neighboring properties that may potentially be impacted?

- **8. Land and Shoreline Use**

- **e. & f. & i.** Are the Land Use of rural residential and the proposed zoning of Public Facility compatible, or does the County need to complete a Comprehensive Plan Amendment to change the Land Use?
- **h.** point of clarification: the Crystal Creek floodplain and floodway appear to be present onsite.

- **11. Light and Glare**

- **a.** Please ensure that no lighting interferes with or unduly illuminates SR 903 or the traveling public.
- Is night work anticipated during construction? If so, please ensure construction lighting does not impact SR 903 or the traveling public.

- **13. Historic and cultural preservation**

- **a.** The referenced Cultural Resources Assessment was not included in the online accessible project information. Please provide that to the City.

- **14. Transportation**

- **d. & h. Will the proposal require any new or improvements to existing roads, streets...**
 - Due to queuing during peak customer hours at the adjacent Transfer Station, vehicles back up onto SR 903 from the Transfer Station gate. This has the potential to block traffic into/out of the proposed County Shop facility.
 - This proposal should include widening the SR 903 shoulder south of the Transfer Station and widening No. 5 Mine Road for the same purpose.
- **f.** peak traffic times are slightly different than listed in this response. Peak travel time on SR 903 near the proposed County Shop are:
 - 7:30am - 9:00am Monday-Friday
 - 2:30pm - 3:30pm Monday-Thursday
 - 1:30pm-2:30pm Fridays
 - (due to the entire school district letting out, which includes all busses and parents that fill up the entire parking lot)
 - 5:00pm-6:00pm Monday-Friday
- In light of this change, will there still be no impacts during peak travel times on SR 903?

- **15. Public Services**

- **Fire**
 - Does the site include fire hydrants?

- Does the County have plans to Firewise or make the property “Fire Adapted”?
- What are the County’s plans for emergency fire suppression during high danger fire seasons?
 - For example, moving from a less fire sensitive/prone location in downtown Cle Elum to a more fire sensitive/prone location adjacent to/surrounded by forest, what is the plan for quickly addressing potentially explosive chemicals, or spark-emitting actions or equipment?
 - Hoses, sprinklers, emergency management plans, etc.?
 - Chemicals – how will these be stored to minimize fire risk?
- Does the County have a plan for site watering such as sprinklers?
- During high fire warnings, is there a plan to minimize fire risk? This is especially important for the City of Cle Elum to the west of the proposed location due to the proximity upon the landscape and the vulnerability of the community being downwind of the proposed County Shop.

I am hoping to receive a response to this letter that includes answers to the bulleted comments above, where applicable.

Thank you for the opportunity to comment and please let me know if you have any questions.

Best Regards,

Lucy Temple
City Planner

Cc: Laura Osiadacz, Upper County Commissioner
 Lindsay Ozbolt, County Planning Official
 Mark Cook, County Public Works Director
 Jay McGowan, Mayor
 Robert Omans, Administrator
 Mike Engelhart, Public Works Director
 Scott Ferguson, Police Chief
 Ed Mills, Fire Chief
 Lucy Temple, Planner
 Cle Elum City Council
 Cle Elum Planning Commission