



KITTITAS COUNTY COMMUNITY DEVELOPMENT SERVICES

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Office (509) 962-7506

March 12, 2021

Brown and Jackson
C/O Ricki Schmitt
107 N Main St.
Ellensburg, WA 98926

RE: Brown and Jackson (File #SE-20-00003)

Dear Mrs. Schmitt:

This letter is in regards to the above referenced applications that Kittitas County Community Development Services has been in receipt of and subsequently reviewed. Upon review of the application the following issues have come to light in regards to the proposals as listed below. These items raise concerns regarding the project having significant environmental impacts. The items are as follows:

Critical Areas and Wildlife Impacts

The subject property contains fish bearing streams and wetlands. Certain agency and public comments have raised concerns as to potential impacts from the expressed actions (i.e. airborne contaminants through application and disking) as well as potential critical area impacts in the event of containment breaches to the lagoon(s). The Critical Areas Study provided notes two streams in the project vicinity. This conflicts with the assessment of WDFW and Kittitas County Stream Data ,which asserts three streams on the parcel. The third stream, not addressed in the Critical Areas study, appears to be the closest to the proposed project area (map attached below). Clarification will be needed about the nature of this third stream and it's distance from the project area.

Flood Hazards

The subject property is not categorized in the floodplain, however this information was obtained through approximate methodologies and not a direct delineation. This, combined with several comment letters indicating a propensity for out of stream flows and significant runoff from snow melt from the Park Creek Hills, raises concerns about how flooding/runoff might create unintended consequences when interacting with the proposed lagoons. A full Hydrologic Report with Floodplain Delineation will be required.

Ground Water and Irrigation Channel Impacts

A spill recovery plan which addresses vehicle spills was provided in your comment response documents. This plan does not address spills that can happen as a result of lagoon failure or if the lagoon(s) were overtaken by flood waters. CDS has concerns with how an unintended leak may impact groundwater and/or inadvertent irrigation channel infiltration. The Engineering Report provided notes test holes of four to five feet in depth, dug in March 2020 approximately 75 feet from Park Creek. The report

DAN CARLSON, DIRECTOR

JEREMY JOHNSTON, PLANNING OFFICIAL

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describes these test holes as being dug downslope of the proposed project location which is at a lower elevation than the bottom of the proposed ponds. As ground water levels are not always horizontal, CDS is not convinced this clearly indicates the depth of the ground water at the proposed location. Lagoon infiltration into groundwater could have significant impacts on groundwater quality. More information is needed regarding how the system will prevent any interaction with ground water in the event of a leak or spill. CDS will also require specific information about the location and depth of groundwater at the project site.

Impacts to Adjacent Property

The proposed development is in proximity to some residences including a treatment facility operated by the Washington State Department of Children, Youth and Families. Many concerns have been raised as to smell impacts and subsequent impacts to adjacent property values and quality of life. The Engineering Report provided deals briefly with this issue by noting that the winds in the area commonly flow away from the DCYF facility, but does not provide enough detail as to how air quality will impact other property owners. CDS will require an independent assessment regarding potential impacts to property values related to smell and or visual impacts that could result from this project.

Wildlife and General Safety

It appears the project includes one fence that sits along the parcel boundary. The adjacent DCYF facility provides a potential interaction with the project area and runaway youth. CDS has concerns with protection for human safety in the event that a youth runs away from the facility, particularly during evening hours where visual cues are limited, and fall into one of the lagoons. A similar concern exists for Wildlife that are able to traverse the property line fences. CDS will require a robust safety plan that accounts for these possibilities.

General Operations

Facilities such as these are usually managed by municipalities and despite mandatory trainings, regulated design standards, inspections and daily monitoring, serious issues still are not uncommon. CDS has concerns that despite the applicant's best efforts there can be serious externalities and unintended issues that can potentially have significant impacts on adjacent property owners with a project such as this. CDS will need to understand how your design and maintenance plan will avoid the common issues that can arise in these types of facilities.

These items and impacts need to be addressed as part of the processing of the application, and appropriate information needs to be submitted that adequately addresses each item noted. This information needs to be provided in order to be able to support the issuance of the appropriate SEPA determinations. Due to the apparent potential significant impacts associated with this application proposal, CDS is likely to issue a Determination of Significance. Additional information will assist us in making a final determination on the likely potential impacts of this project application.

If you have any questions, please feel free to contact me at (509) 962-7065. Thank you in advance for addressing these.

Sincerely,
Kittitas County Community Development Services



Jeremy Johnston
Planning Official

CC Dan Carlson, CDS
Kelly Bacon, CDS
Neil Caulkins, Deputy Prosecutor

