

August 5, 2024

Chace Pedersen
Planner I
Kittitas County Community Development Services
411 N Ruby St #2
Ellensburg, WA 98926

RE: Johnson Ag Utility Building SEPA Application (SE-24-00021)
– Transmittal of Comments (Parcel #145133)

Mr. Pedersen,

This letter is response to the SEPA Plan Review Comments dated July 25 and the Request for Additional Information dated July 31 for the above referenced project.

We have included their original comments for your reference with our response to each comment below, in *italics* for visual clarity.

Washington State Department of Natural Resources – Amanda Moody:

Thank you for the opportunity to comment on the proposed project on parcel(s) 145133 in Section 16, T. 17 N., Range 17 E., W.M.; Kittitas County.

Based on remote review of this parcel(s) it appears that some or all of the parcel(s) consist of forestland, and it will require a Forest Practices Application (FPA) from the DNR if merchantable timber is removed/harvested as part of the proposal and/or is being converted out of forest land (RCW 76.09 and WAC 222). The FPA would need to meet the requirements of the Forest Practices Act and its rules. It is our recommendation that the applicant meet with our local forest practices forester to discuss, they may call our Southeast Region office at (509) 925-8510 to schedule an appointment.

BORA – An FPA is in process and will be submitted once this SEPA is approved. BORArchitecture has been in coordination with Marty Mauney of DNR and met on-site to review the project on March 4, 2024.

Yakama Nation – Jessica Lally:

This location is high probability for encountering cultural resources. Yakama Nation CRP is requesting survey.

BORA – An Archeological Cultural Resource Survey was performed on 7/23/24. No resources were located, and RLR Cultural Resources LLC will be putting together the report. I will forward the draft report when received, and the final report when received.

Snoqualmie Nation – Adam Osbekoff:

The Snoqualmie Indian Tribes Department of Archaeology and Historic Preservation have no current comments regarding the above-mentioned project.

BORA – See response to Yakama Nation – Jessica Lally.

Kittitas Valley Fire and Rescue – Rich Elliot:

1. The building will need to be provided with access that is compliant with current Appendix D –IFC.
BORA – The building will be compliant with access as shown in Appendix D of the IFC.
2. The building’s designated use will drive any sprinkler, alarm, fire-resistive construction requirements.
BORA – Fire Sprinklers are not required according to the building use, type, and construction (Portland Cement Plaster Stucco or Premanufactured (Concrete) Stone on Insulated Concrete Form (ICF) walls with a non-combustible metal roof system).
3. Owner shall purchase KVFR Knox key box and install per FD direction. Owner will provide access keys for Knox Box.
BORA – The building will have a Knox key box if required for a residential building, per KVFR direction.
4. If there is a gated access to the property, a separate Knox box or gate activation will be required.
BORA – There is no gate at the access to the property.
5. Hazardous materials storage will comply with current IFC and IRC.
BORA – No hazardous materials are expected to be stored, but if any are they will be compliant with the IFC and IRC.
6. Water supply requirements shall be met by owner prior to occupancy.
BORA – Confirmed.
7. The building will comply with current WUI code.
BORA – The building will be compliant with Wildland-Urban Interface (WUI) code, with Conforming Defensible Space, Non-Conforming Water Supply, and Ignition-Resistant Construction category IR-1 in a High Hazard Fire Area (as calculated per Appendix C). See attached wall section for construction type.

Washington State Department of Health – Office of Drinking Water – Russell Mau:

The additional structure that may connect to the existing well does not meet the definition of a public water system – only a second connection, only 3 total persons with access to the water, and same 3 persons as live on-site. So there is no additional water usage.

BORA – Acknowledged.

Kittitas County Public Health – Dan Suggs:

Public Health has no comment for the SEPA application: SE-24-00021 Johnson Ag Utility Barn. So long as everything that was submitted in the application is true.

BORA – The information submitted is as accurate as known and will conform to current codes.

Confederated Tribes of the Colville Reservation – Connor Armi:

The proposed project falls outside the CTCR's traditional territory. Any cultural concerns we may have will be adequately addressed by the interest and concerns of other interested Tribes.

BORA – See response to Yakama Nation – Jessica Lally.

Kittitas PUD:

Kittitas PUD does not have any comments on this project.

BORA – Acknowledged.

Kittitas County Department of Public Works:

ACCESS

1. An approved access permit shall be required from the Kittitas County Department of Public Works prior to creating any new driveway access or altering an existing access. Refer to Chapter 12 of the Kittitas County Code for access requirements.

BORA – No new access from the public road is required. Existing driveway and access is to be maintained. The site will be adjusted to provide access within the site.

2. Maintenance of driveway approaches shall be the responsibility of the owner whose property they serve. The County will not maintain accesses. In addition to the above-mentioned conditions, all applicable Kittitas County Road Standards apply to this proposal. Access is not guaranteed to any existing or created parcel on this application.

BORA – Maintenance of driveway approaches and access are the responsibility of the Owner.

ENGINEERING

Except as exempted in 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). (CP)

BORA – A grading permit and an engineered grading plan will be submitted as part of the building permit package.

SURVEY

The provided documents included in the application do not adequately identify the West boundary of the subject parcel. From the information provided, it appears that the proposed barn may encroach or trespass on the parcel to the West. If the applicant does not wish to provide this information as part of the application, a Land Surveyor shall be utilized for the building layout and confirm it falls within the setback area of the subject parcel. (JT)

BORA – A survey has been performed and a full Civil design will be provided with the building permit. The building location is approximately 31' to the parcel to the west, which is also owned by this Owner, and 198' to the adjacent property.

TRANSPORTATION CONCURRENCY

No Comments.

FLOOD

Most of this property is located within the 100-year floodplain and floodway. All construction, including structures that are exempt from a building permit, must follow the guidelines within KCC 14.08.

The floodway is highly restricted, and any development must demonstrate no rise in the level of the 100-year flood before being permitted. No new or substantially improved residential structures are allowed within the floodway.

All of the proposed development must be located outside the floodway and certified survey of the parcel showing the location of the floodway is necessary to establish that the building will not encroach upon the floodway

Please call the Kittitas County Public Works at (509) 962-7523 to discuss this project and permitting requirements. (SC)

BORA – The building and all improvements are located outside of both the Flood Plain and Flood Way. A survey has been performed and a full Civil design showing this condition will be provided with the building permit. See attached preliminary site plan with notation.

WATER MITIGATION/ METERING

BORArchitecture, PLLC 1320 N. 16th Avenue, Suite C, Yakima WA 98902 (509) 454-3299 www.borarch.com

Per KCC 13.35.027 all new uses of ground water require mitigation and metering. Proof of mitigation is required prior to applying for a building permit. (SC)

BORA – The building is an out building to an existing single family residence and will not house any additional dwelling units. The amount of full time occupants will remain at 3 before and after construction, and there will be no additional water usage. The existing system for the residence will be used and connected to this building.

AIRPORT
N/A

Washington State Department of Ecology - Water Quality Program:

Project with Potential to Discharge Off-Site

If your project anticipates disturbing ground with the potential for stormwater discharge off-site, the NPDES Construction Stormwater General Permit is recommended. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit may take 38-60 days. The permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction.

In the event that an unpermitted Stormwater discharge does occur off-site, it is a violation of Chapter 90.48 RCW, Water Pollution Control and is subject to enforcement action. More information on the stormwater program may be found on Ecology's stormwater website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/>. Please submit an application or contact Wendy Neet at the Dept. of Ecology, (509) 571-6733. or wnee461@ecy.wa.gov with questions about this permit.

BORA – All stormwater discharge will be contained on-site. A Temporary Erosion and Sediment Control Plan will be provided as part of the Civil Engineering design. Civil Engineering indicates that total land disturbance will be less than 1 acre, therefore neither a NPDES Construction Stormwater General Permit nor a Stormwater Pollution Prevention Plan are required. See attached preliminary site plan for proposed location of building, road, and utility placements. All applicable building permit will be applied for during construction.

Washington State Department of Ecology - Shorelands and Environmental Assistance Program

There is some confusion around the use of the structure. The application defines the structure as an "ag utility" building, however some of the application materials identify the structure as a "barn-style residence." The application states that a shoreline exemption will be attained to satisfy the requirements of the Kittitas County SMP, our concern is that this structure does not qualify for an exemption and may require a Shoreline Substantial Development (SDP) instead depending on the use of the building. In section 8 of the SEPA checklist it states that the site does not include working farmlands. Being neither working farmlands nor a Single Family Residence we need clarification as to what exemption this structure qualifies for.

The property is located in the Rural Conservancy shoreline designation which has a buffer of 100' to the Creek. We also have concern that the site plan does not show the existing access to the construction site, nor other required information do determine if work in the buffer will be necessary to modify the existing access for construction of the new structure. If so, this work may trigger the need for additional shoreline review.

BORA – The new structure is an Out / Utility Building separate from the existing single family residence. No dwelling units will be part of the new structure. The parcel is a single family residence, there are no commercial working farmlands. The structure is roughly 314' to Manastash Creek. A Channel Migration Zone analysis had been conducted and submitted showing it is unlikely that within a 140 year time frame the creek will migrate to be close to the structure, but a Shoreline Exemption Permit was applied for under suggestion of Kittitas County personnel as the project is within 200 feet of the associated floodway, though the structure will not be within the Flood Way or Flood Plain.

Per meeting on site with Scott Downes of Washington Department of Fish and Wildlife on March 4, 2024, an HPA permit from WDFW is not required as potentially placing steel plates during construction activities does not require an HPA permit. Future maintenance to the bridge will be coordinated with WDFW. No additional access modifications within the buffer are required.

Washington State Department of Fish and Wildlife – Jennifer Nelson

We appreciate the reports, studies and information provided with the application materials by the applicant. This information was helpful in our review. In addition to the materials provided, WDFW staff have visited this property and adjacent properties prior in recent years. We have observed a very active beaver colony that is creating habitat and potentially altering the location of Manastash Creek and its side channels. The presence of an active beaver colony was not reflected in the channel migration study or site photos. We provide this information as it will likely alter the flow regimes over time and should be considered for all future developments, including new buildings and infrastructure.

Some of the photos and information provided show that there are talus slopes and/or cliffs present near the proposed building site. Talus slopes and cliffs are priority habitats within WDFW's Priority Habitats and Species (PHS) program and warrant further consideration for how they will be protected and/or mitigated for with construction of the building that appears to be cut into the slope. This parcel and surrounding properties are also recognized as important mule deer winter range, another PHS listing. WDFW requests that all critical areas in the project area be identified and evaluated for the need for a habitat management and/or habitat mitigation plan.

Manastash Creek has been a priority for restoration of salmon and steelhead and there are many success stories. All the fish passage barriers have been removed and the irrigation diversions are properly screened for the protection of fish life. Chinook and coho salmon can be found in this reach of Manastash Creek as well as federally threatened Mid-Columbia Steelhead. It is critical to the recovery of salmon and steelhead that these investments are protected and enhanced where possible. WDFW also wants to ensure that any work over, near, or in Manastash Creek is only completed after a Hydraulic Project Approval (HPA) permit has been secured from WDFW.

WDFW appreciates the efforts that have already occurred to identify the Geologically Hazardous Areas (GHA) such as the Channel Migration Zone and steep slopes. We did not see information provided about frequently flooded areas or other critical areas such as Critical Aquifer Recharge Areas, Wetlands, or Fish and Wildlife Habitat Conservation Areas (FWHCA). We would welcome the opportunity to have a site visit with the applicants and/or County to better understand the potential risks or benefits to all critical areas, particularly the FWHCAs.

We understand how the overlapping critical areas in this area may be overwhelming. We are committed to working cooperatively to help this project move forward while ensuring the proper identification and protection of the critical areas present. We would welcome the opportunity to visit the site with the proponents to better understand the proposal and discuss avoidance and mitigation strategies for the FWHCAs. Thank you again for the opportunity to comment and please let me know if there are any questions or comments we can answer.

BORA – No active beaver colony was observed on the Owner's parcels, though future activity will be taken into consideration. The PHS report (see attached) shows mule deer as the primary species, and is not a sensitive location. Care will be taken with the construction of the structure and site to disturb as little as possible.

The parcel is adjacent to but not with the Wenas Wildlife area and does not appear to be a Habitat Conservation Area. No additional water usage will occur due to the new structure, so the Critical Aquifer Recharge Area (if applicable) will not be affected.

No work is being done at Manastash Creek. Per meeting on site with Scott Downes of Washington Department of Fish and Wildlife on March 4, 2024, an HPA permit from WDFW is not required as potentially placing steel plates during construction activities does not require an HPA permit. Future maintenance to the bridge will be coordinated with WDFW.

Kittitas County Community Development Services (CDS) – Chace Pedersen

- Certified survey of the parcel showing the location of the floodway in relation to the project site. This is necessary to ensure the proposed structure does not encroach upon the floodway.

BORA – Attached please find a Civil Engineering Drawing / Survey showing the floodway, flood plain, and building location. The proposed building does not encroach on the flood way or flood plain.

- Pursuant to KCC 17A.01.110(2), please submit a Critical Areas Report (to be completed by a qualified professional) which conforms to the standards of KCC 17A.01.080.

BORA – Per email coordination with Jennifer Nelson at the WA Department of Fish and Wildlife, and Chace Pedersen at Kittitas County CDS, this Critical Areas Report does not need to be submitted at this time. See attached PHS Report for Wildlife Areas and response to Jennifer Nelson above.

- Please provide an updated narrative and building plans showing the use of the proposed structure.

Best regards,

BORA – See attached preliminary building floor plans and wall sections. The building is a non-dwelling unit accessory structure to the existing single family home residence. It contains an open multi-purpose space with various storage rooms on the 1st level, and an exercise area, including pickleball court and weights area, with associated entertaining spaces for group events if desired, with associated incidental spaces on both levels (restrooms, mechanical room, etc.). The building structure is Insulated Concrete Forms (ICFs) with either stone or stucco exterior (non-combustible), with non-combustible soffits, fascia, and metal roofing.

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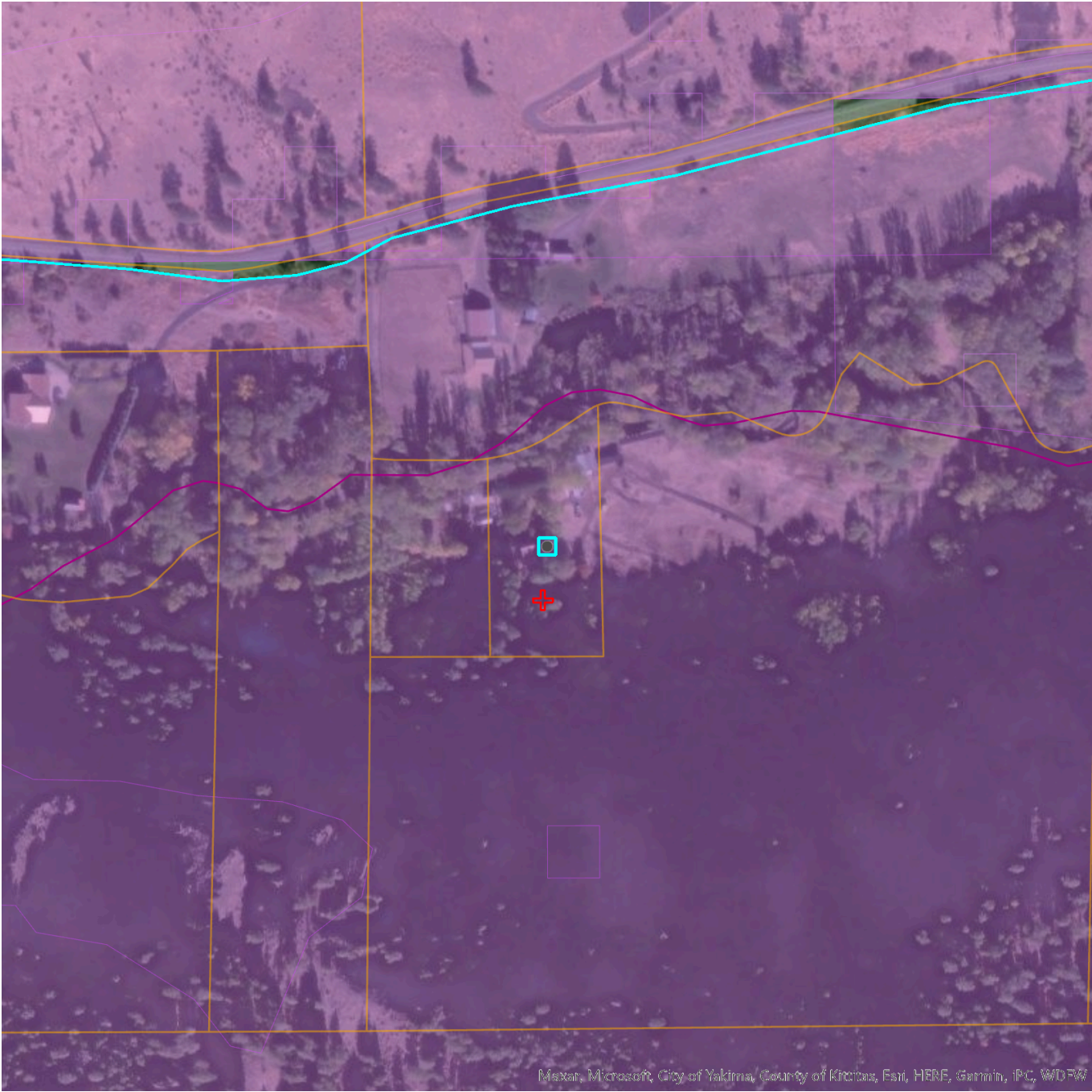


David J Carson

2320



Priority Habitats and Species on the Web



Report Date: 07/30/2024

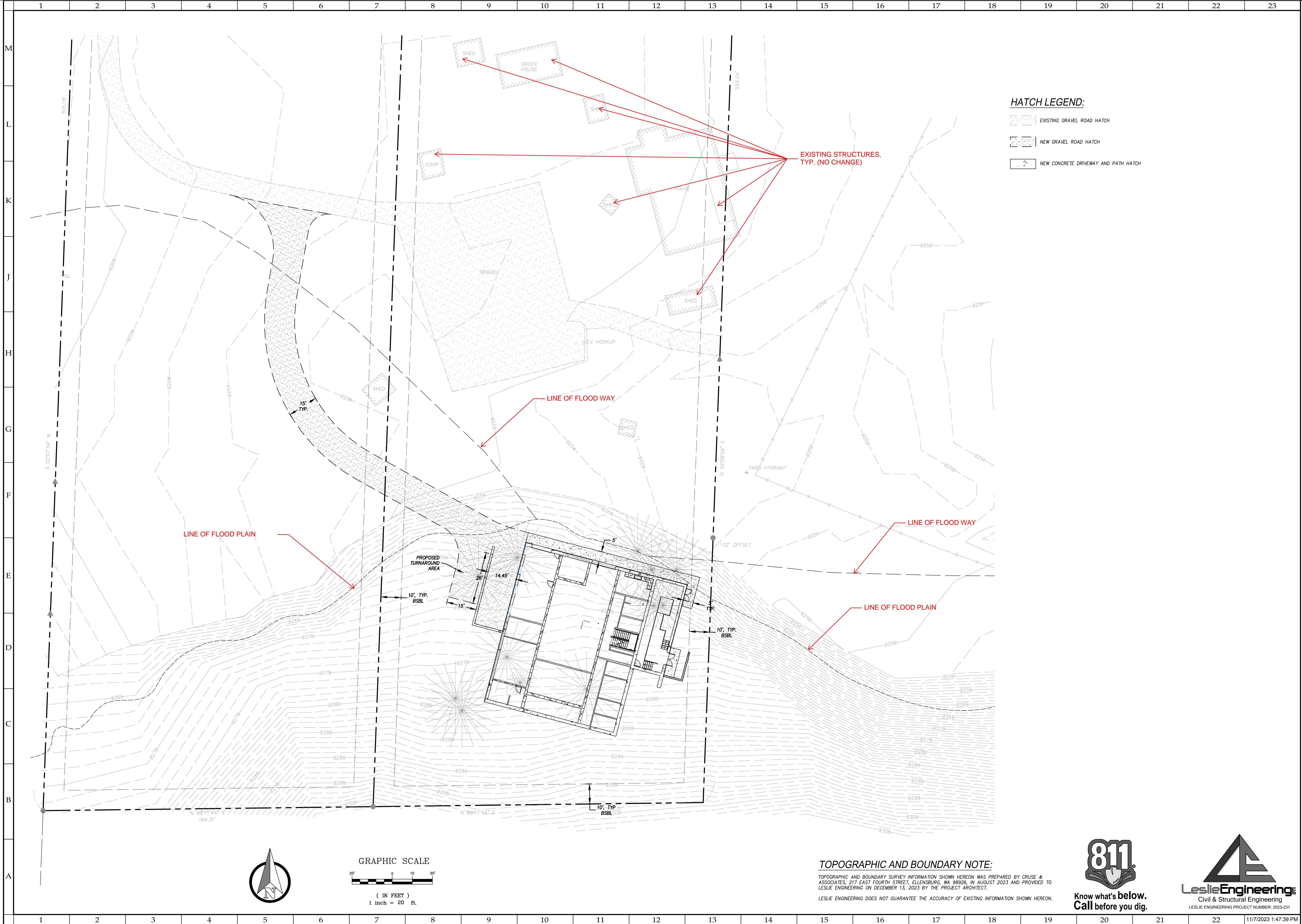
PHS Species/Habitats Overview:

Occurence Name	Federal Status	State Status	Sensitive Location
Mule deer	N/A	N/A	No

PHS Species/Habitats Details:

Mule deer	
Scientific Name	<i>Odocoileus hemionus hemionus</i>
Priority Area	Regular Concentration
Site Name	WHEELER CYN DEER WINTER RANGE HIGH CONCENTRATION
Accuracy	1/4 mile (Quarter Section)
Notes	DEER WINTER RANGE - HIGH CONCENTRATIONS 200-300 DEER; WHEELER CANYON AREA
Source Record	901344
Source Dataset	PHSREGION
Source Name	LANDRIE, L.; ESSMAN, B.
Source Entity	WA Dept. of Fish and Wildlife
Federal Status	N/A
State Status	N/A
PHS Listing Status	PHS LISTED OCCURRENCE
Sensitive	N
SGCN	N
Display Resolution	AS MAPPED
ManagementRecommendations	http://wdfw.wa.gov/publications/pub.php?id=00612
Geometry Type	Polygons

DISCLAIMER. This report includes information that the Washington Department of Fish and Wildlife (WDFW) maintains in a central computer database. It is not an attempt to provide you with an official agency response as to the impacts of your project on fish and wildlife. This information only documents the location of fish and wildlife resources to the best of our knowledge. It is not a complete inventory and it is important to note that fish and wildlife resources may occur in areas not currently known to WDFW biologists, or in areas for which comprehensive surveys have not been conducted. Site specific surveys are frequently necessary to rule out the presence of priority resources. Locations of fish and wildlife resources are subject to variation caused by disturbance, changes in season and weather, and other factors. WDFW does not recommend using reports more than six months old.



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CONSTRUCTION DOCUMENTS

CIVIL SITE PLAN

JOHNSON BARN

11810 MANATASH RD ELLENSBURG WA 98926

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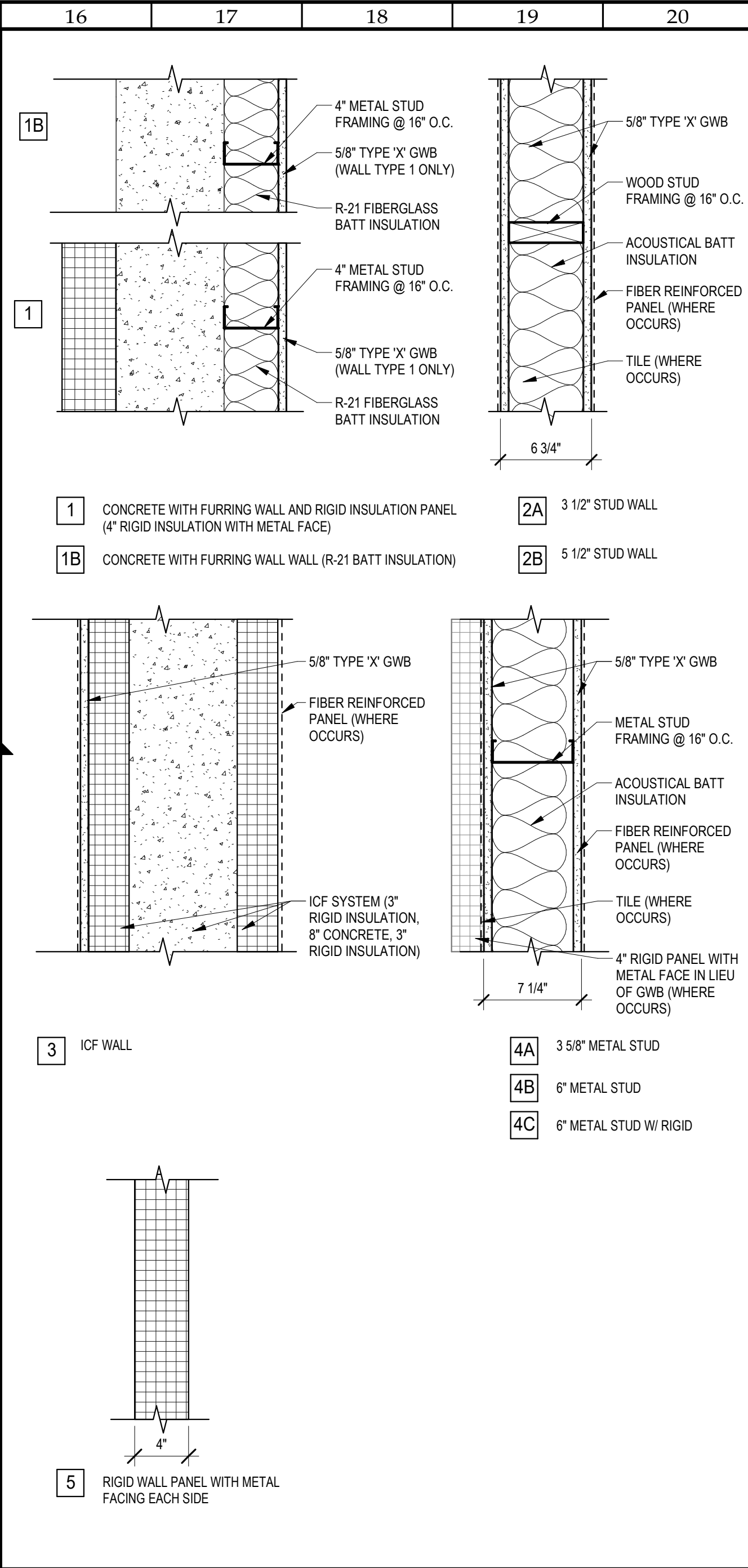
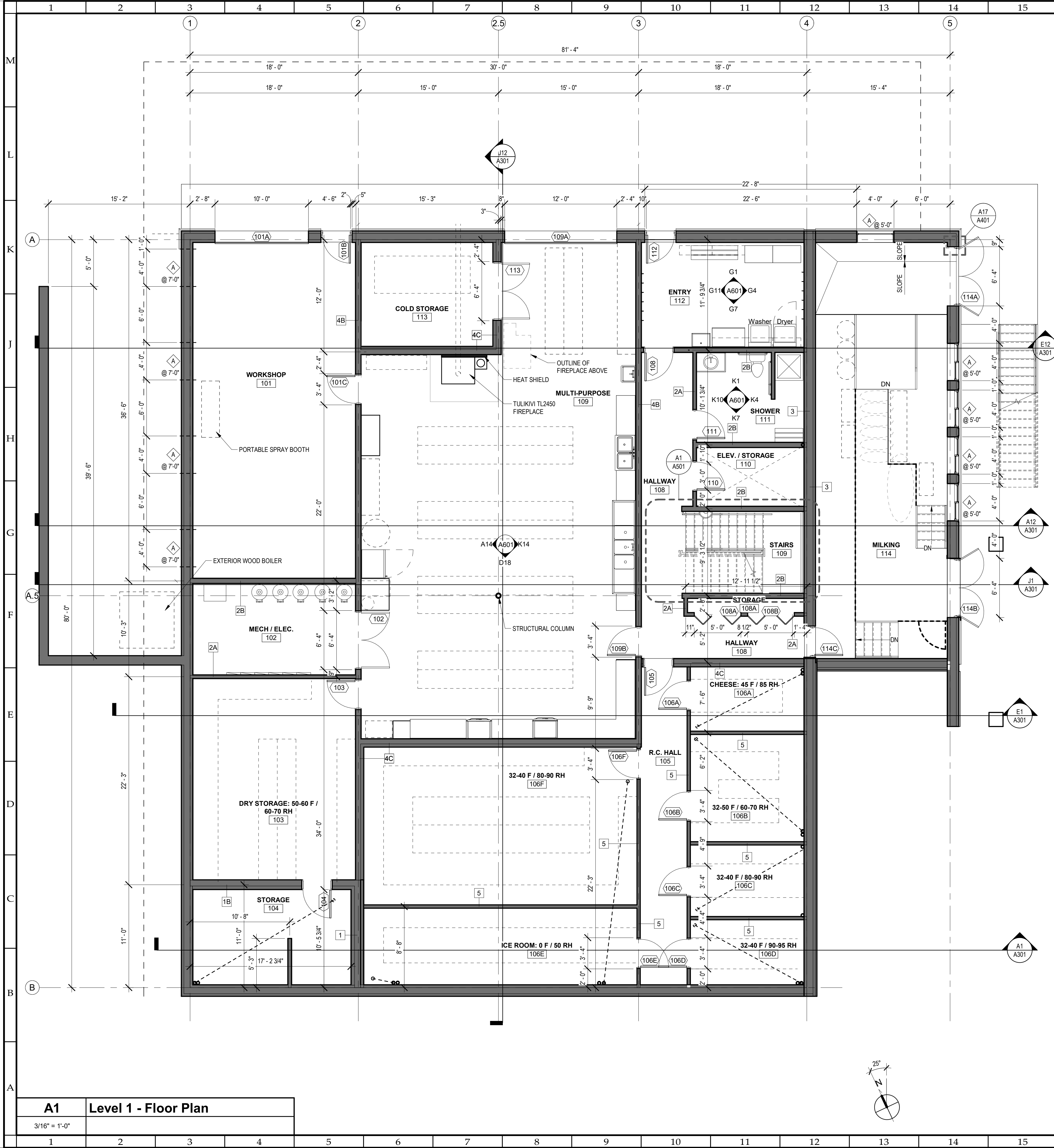
SHEET NAME

CIVIL SITE PLAN

SHEET NO.

C300

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G16	INTERIOR PARTITION TYPES
1 1/2" = 1'-0"	

RM. AREA		
#	Name	Area
101	WORKSHOP	626 SF
102	MECH / ELEC.	170 SF
103	DRY STORAGE: 50-60 F / 60-70 RH	375 SF
104	STORAGE	170 SF
105	R.C. HALL	169 SF
106A	CHEESE: 45 F / 85 RH	84 SF
106B	32-50 F / 60-70 RH	139 SF
106C	32-40 F / 80-90 RH	93 SF
106D	32-40 F / 90-95 RH	84 SF
106E	ICE ROOM: 0 F / 50 RH	239 SF
106F	32-40 F / 80-90 RH	493 SF
108	HALLWAY	220 SF
108A	STORAGE	19 SF
109	MULTI-PURPOSE	1379 SF
109	STAIRS	114 SF
110	ELEV. / STORAGE	72 SF
111	SHOWER	109 SF
112	ENTRY	197 SF
113	COLD STORAGE	157 SF
114	MILKING	629 SF
201	ENTRY	89 SF
201A	CLOSET	27 SF
202	HALLWAY	183 SF
202	PICKLEBALL	2099 SF
202A	STAIRS	115 SF
203	BATHROOM	72 SF
203A	SAUNA	32 SF
204	ELEV. / STORAGE	72 SF
205	KITCHEN	314 SF
205A	PANTRY	13 SF
206	LOUNGE	461 SF
207	EXERCISE	270 SF
208	HALLWAY	146 SF
208A	CLOSET	26 SF
209	OFFICE	225 SF
210	BATHROOM	114 SF
210A	TOILET	24 SF
211	CHANGING	66 SF
212	SAUNA	115 SF
213	HALLWAY	77 SF
214	STORAGE	102 SF
215	STORAGE	124 SF
216	WETBAR	204 SF
301	LOFT	339 SF
302	LOFT STORAGE	246 SF

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SCHEMATIC DESIGN

JOHNSON BARN

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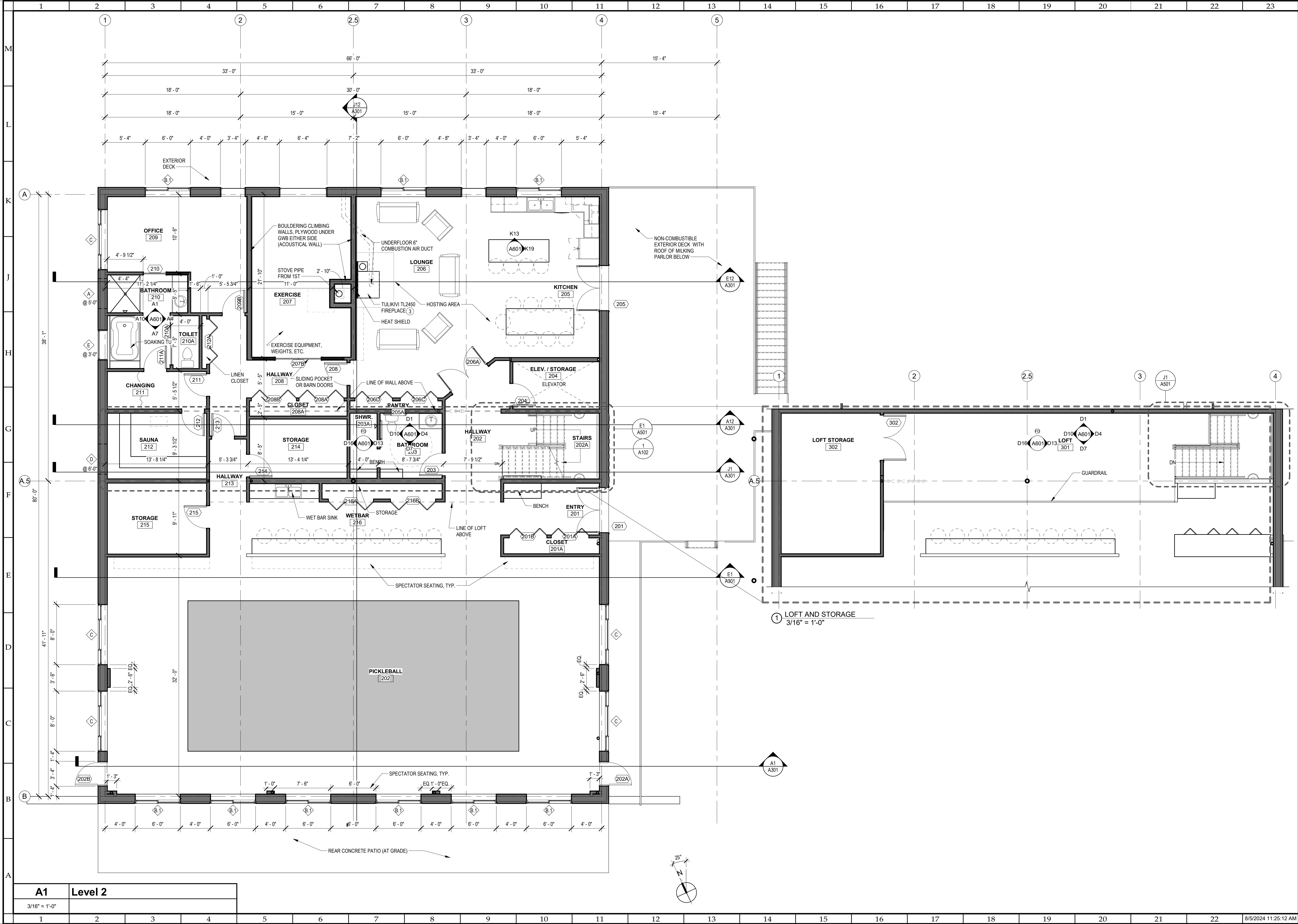
FIRST FLOOR PLAN

SHEET NO.

A101

C:\Users\carson\OneDrive - BORArchitecture, pllc\Documents\2320 Johnson Barn CENTRAL_carsonGK\5\rvt

8/5/2024 11:25:12 AM



A1	Level 2
3/16" = 1'-0"	

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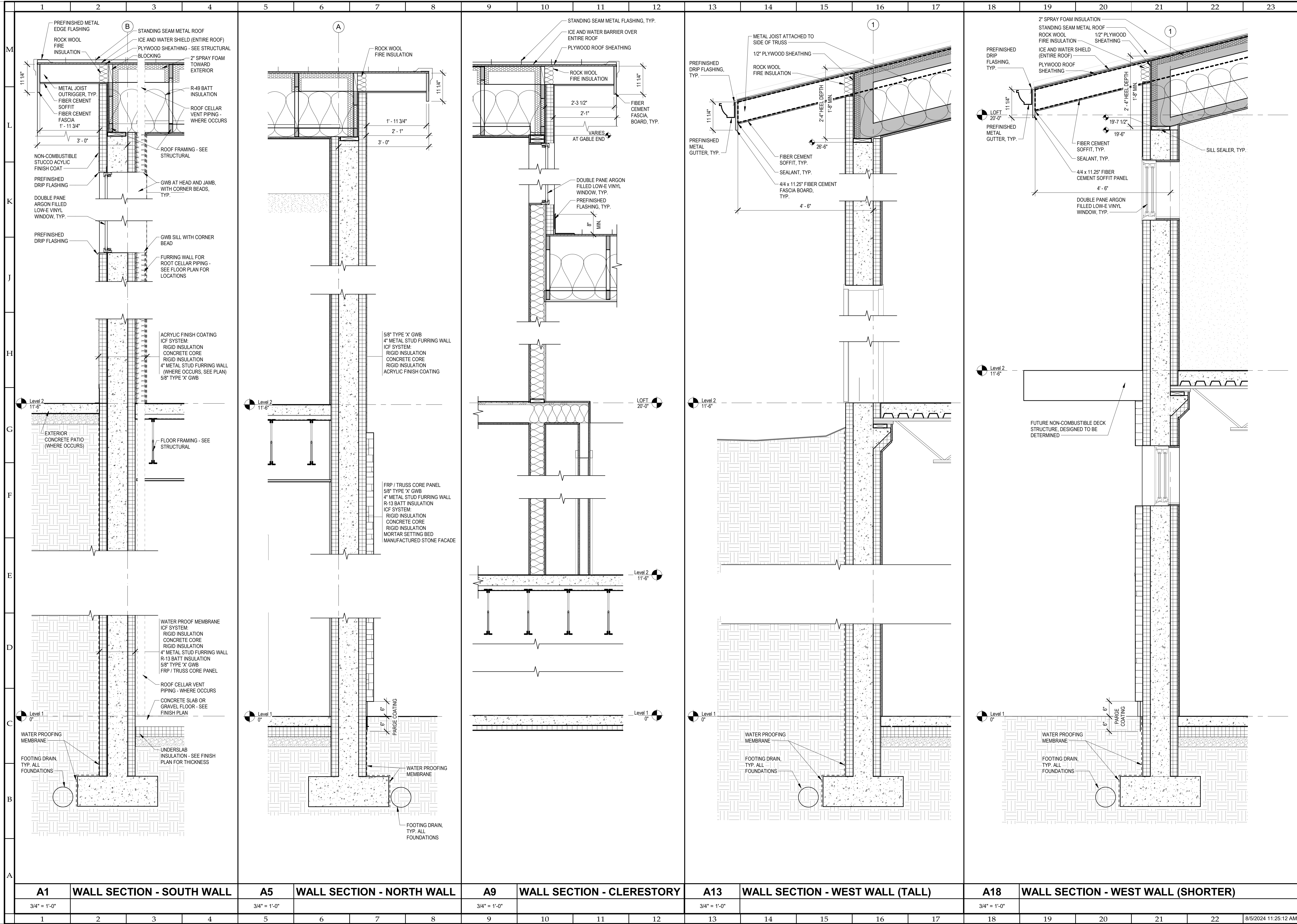
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SHEET NAME
**2ND FLOOR
PLAN AND LOFT**

SHEET NO.
A102



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WALL SECTIONS

SHEET NO.
A321