



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

November 16, 2018

Jacob Clay
Yakima County Planning Division
128 North 2nd Street
4th Floor Courthouse
Yakima, WA 98901

Re: CUP2018-00099, SEP2018-00047

Dear Jacob Clay:

Thank you for opportunity to comment on the pre-threshold determination for the Sage Brush Ranch development of a new concentrated animal feeding operation and dairy. This project is proposed by FRH Enterprises, LLC. We have reviewed the environmental checklist and have the following comment.

WATER QUALITY

Total Maximum Daily Load

The proposed project is in the lower Yakima River watershed, which has a Total Maximum Daily Load (TMDL) water quality improvement program addressing water quality impairments for suspended sediment and turbidity. The maps attached to the SEPA application identify at least two seasonal streams that run directly through the project area. Washington State water quality standards include coverage for seasonal streams; therefore, the proposed project will need to protect the streams on and near the project site from degradation. Project planning, development, and use of the site should include water quality protection. Please contact **Jane Creech** (509) 454-7860 or email jton461@ecy.wa.gov, if you have questions about this TMDL 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



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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 **Lloyd Stevens, Jr.** at the Dept. of Ecology, (509) 574-3991, with questions about this permit.

WATER RESOURCES

The narrative provided is consistent with Ecology's understanding that the project is a consolidation of existing facilities. It is also our understanding that the existing facilities will be abandoned after the consolidation and any new uses proposed on those parcels would be evaluated as necessary. With the consolidation, there are no expected new net impacts to the Wanapum formation, and the proponent should continue to avoid new impacts.

If you have any questions or would like to respond to these Water Resources comments, please contact **Jolee Ramos** at (509) 454-4173 or email at jolee.ramos@ecy.wa.gov.

Sincerely,



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