



January 9, 2003

Boundary Review Board for Yakima County
Room 416, Yakima County Courthouse
Yakima, Washington 98901

Via Email terrc@co.yakima.wa.us

RE: File No.: BRB 2-06, City of Toppenish/Parrish Annexation

Determination of Nonsignificance (DNS) Yakima County Corrections Facility
FOGH (Friends of Grays Harbor) would like to take this opportunity to join with the Yakima Nation in their objection and opposition to the proposed annexation and location of a 1728-bed prison on property immediately adjacent to tribal lands. We incorporate their comments by reference.

FOGH is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The goal of FOGH is to protect the natural environment and human health in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment. Some of the members of FOGH are also members of the Yakima Nation and therefore will be adversely affected by this proposal.

We are concerned that a project which will effectively increase the population of Toppenish by 30% has been given a Determination of Non-Significance. We have reviewed the SEPA checklist that lead to this determination and find it woefully inadequate. We request that the DNS be withdrawn and a finding of significance be issued requiring the issuance of an Environmental Impact Statement.

It appears that proponents have minimized the potential impacts to the environment in order to avoid preparation of an Environmental Impact Statement. For example, B1g answer to the checklist question about impervious surface states "Approximately 40%." However, in a 38 acre project that creates a cover of approximately 15.2 acres or 662,112 square feet of impervious surface. Thus for every 1" of rain falling on the site, 27,152 gallons of water would be removed from infiltration into the area. In an area of limited water supply, this has significance impact on recharge and should be discussed more adequately. In addition, there is no discussion about the approximately 22.8 acres of land that will not be covered but will presumably be managed. While landscaping is mentioned there is no discussion of pesticide or fertilizer use or how areas of no-grow will be treated.

Lighting from a prison is a significant factor to the surrounding rural atmosphere. It is mentioned that each light will be 400-watt halogen, but there is not a discussion of the number of units, therefore calculations of lumens for the existing environment and the built environment are not possible.

The State of Washington recently located a 1935-bed prison in the Grays Harbor area. The personnel requirements for that facility were stated to be 650 people. It appears that a staff of 207 persons at a 1728-bed facility provides a very low inmate/personnel ratio. This presents a potential concern for public health and safety and should be more fully discussed.

It is unusual that 1728 inmates would not have some sort of required “work” or “project” to help in their rehabilitation. Yet there is no discussion of any prison industries or projects associated with this proposal. If there is to be no industry, what will the inmates do during their term? If they are to be used for projects outside the prison, how will this effect the depressed rural economy and workforce?

The addition of 2000 people to the water and wastewater facilities of Toppenish Wastewater Treatment Plant (WWTP) requires careful consideration. Normal growth patterns of cities are usually able to absorb water quality needs, however a potential 15% to 30% instant growth challenges even the most well-managed facilities and requires significant capital expenditure. There is inadequate discussion of the impacts of adding this project to the existing WWTP. There is no discussion of the impact of prison waste (notably higher BOD, for example) to the function of the WWTP.

Based on, but not limited to, the above concerns we respectfully request that an Environmental Impact Statement (EIS) be required for this proposed project. We believe that the DNS has fatal flaws and should be withdrawn.

Thank you for this opportunity to comment.

Sincerely,



Arthur (R.D.) Grunbaum
Board Member

cc: Yakama Nation

