

Attachment 3)

3 June, 2015

Noelle Madera  
Senior Project Planner  
Yakima County Planning Division  
128 N. 2<sup>nd</sup> St.  
Yakima, WA 98901

Re: Case No. - CUP2015-00036/SEP2015-00015

We are writing to submit formal comments regarding this proposed Concentrated Animal Feeding Operation project proposal, which we strongly oppose as having extremely detrimental effects on neighboring property. We are the owners of residential and undeveloped native habitat property located within a ½ mile downwind of the proposed CAFO, parcels 23080843002 and 23080844003. These comments are being prepared under an extreme time constraint, as we had no notice from the county as to this proposed project, and only recently became aware of it. Therefore, we strongly request as a minimum a 30 day extension of the comment period, as we will need more time to raise in detail objections, based on research and survey, to the many problematic aspects of this proposal.

In the meantime, there would be certain deleterious effects of this proposed project which would obviously impact neighboring property owners, most of which are addressed, if at all, totally inadequately in the project SEPA Environmental Review. The probable impacts, which certainly extend well beyond the boundaries of the project site include -

- Odor
- Dust
- Ground and surface water contamination
- Ground water depletion
- Habitat destruction
- Noise
- Flies
- Light pollution
- Biosecurity (spread of disease)
- Fire hazard

These are all common problems associated with CAFO operations, and are all aggravated by the particular characteristics and environment of the proposed site. These problems increase exponentially with the size and concentration of the operation. Many can be mitigated by costly practices, but we see no indication that this is the intent of the project developer.

Rather than answer each point in the SEPA questionnaire that seems to be inadequately or incorrectly covered, if addressed at all, we will attempt to summarize some of the major discrepancies that contribute to our serious concern about the above impacts.

The proposed site has been dry land sage steppe, with fairly low rolling hills, intersected by numerous drainage channels. It is at the foot of several square miles of fairly steep topography that drains through the site. Since this property is dry, with no irrigation rights, and has a very dry local microclimate it has remained for over a hundred years with mostly native vegetation cover and has not been previously cultivated. It is not undeveloped for agricultural use, however, having been used for generations for seasonal grazing that has maintained essentially the native habitat in a sustainable manner. We have observed that attempts at cultivation of similar ground in this area has inevitably led to the replacement of native plants by invasive species (cheat grass and russian thistle) accompanied by much wind erosion. The site, while usually very dry, experiences periodic flooding events, caused by thunderstorms and rapid snow melt. Having lived here for over 30 years, we have experienced several severe flood events. Any of these events would be expected to carry contaminated water from the proposed site to other surrounding properties as the flood water makes its way into the existing drainage downstream of the site. The developer's proposed mitigation to divert around or capture all of this water seems totally infeasible with the small size of the proposed storage lagoon. In fact, calculation would indicate that just the drainage off of just the site itself of a 1" rain, even if it could be entirely contained, would overwhelm the proposed 1,000,000 gallon lagoon several times over.

A large concern is the amount of waste that would be generated on the site. This would be a combination of animal wastes generated in the pens, feed storage leachate, waste stockpiled or stored, etc. Keeping all of this waste, which would include any storm water that crossed the site, which would itself become contaminated, from leaving the site would seem to be impossible given the plan presented. The amount of waste generated may be considerable. While the numbers of cattle proposed to be hosted at this site are conspicuously not addressed in any of the permit documentation, simple extrapolation from the proposed size and layout of the pens (starting with 6000 nursery hutches) leads to numbers as high as several tens of thousands. If so, these numbers would indicate that the mitigation proposed by the applicant is insufficient by orders of magnitude. The completely inadequate waste storage lagoon has already been mentioned; this could not reasonably be expected to store indefinitely the amount of waste produced by this many animals. There is no conceivable way that this amount of waste could be spread on the site property, even if it was to be able to be cropped (highly dubious due to the dry microclimate). The only alternative is to haul the waste away and find sufficient cropland to spread it on, which, of course can only be done during the normal growing season, and the animals will produce waste all year long. The inevitable concentration of wastes will also make odor and dust control extremely costly and difficult, if not impossible. In addition, such a high concentration of wastes containing biological contaminants leads to likelihood of groundwater contamination, through leaching directly through the highly permeable soil profile both on site and from surface water runoff to other areas.

The amount of water that will be necessary to support this proposed use is not adequately addressed, other than to claim that wells on site will draw approximately 50000 gal./day (per Narrative). This figure is unbelievably low. Even for 25000 cattle, that would be only 2 gallons per cow per day. That would not even be sufficient for drinking water, and does not consider the water that will be needed for dust abatement, cooling and other uses. The amount of water actually extracted will impact the above waste concerns, as it will clearly not all be consumed or evaporated, but will contribute to the waste stream. This also directly impacts the potential for ground water depletion beyond natural recharge rates which could have negative impacts on surrounding domestic wells. It is very important to address the current hydrologic groundwater profiles and dynamics in the entire area to fully assess potential negative impacts on existing wells; this does not seem to have been addressed at all in the SEPA filing.

One disturbing consequence of the proposed development is the total destruction of the native habitat on the site as described in the SEPA declaration. This will remove a large block of what has been for generations a continuous area of sage steppe habitat that approximates the native environment that predates agricultural development in the area. This will put additional pressure on an existing ecosystem that includes birds, mammals, reptiles and the complex desert food web that supports it. Known species that will be affected include numerous raptors, such as hawks, burrowing and other owls, deer, coyotes, badgers, and various smaller mammals.

A particularly dangerous concern is the increased risk of wildfire that may result from operational activity and storage of combustible feed. Besides the obvious destruction of vegetation, causing loss of habitat and exposing the soil to erosion, wildfire in this area can easily spread to adjacent properties and threaten residences and other structures. This concern was not addressed at all in the proposal. At the very least this threat needs to be mitigated by providing on site water and other means of suppressing fires. This should also require annexation into a fire district so that the property can contribute to additional fire fighting costs.

We realize that we have not been able in this short letter to fully address the many concerns raised by the presentation of this proposed project. However, we hope that we have been able to communicate the sense that the SEPA filing made by the applicant has completely failed to address the many concerns that we are raising. The document presents figures that are inconsistent, demonstrably wrong and does not even address many obvious negative environmental impacts. We believe that there is ample reason for the Planning Division to deny this project application outright. Failing in that, we certainly feel that all concerned and affected parties should be given the opportunity to more fully present their case for denial by extending the comment period for at least 30 days and granting a full hearing where more detailed evidence can be presented. In the meantime, the project applicant appears to be proceeding with development of the proposed site, even as the permitting process has hardly begun. Many acres of vegetation have already been destroyed, a well is being drilled, and it appears road construction has been started. It seems to us that this should be prevented until, and if, such time as the project is actually approved.

There is no doubt that if this project is constructed and becomes operational the impact on the quality of life for those of us living on properties in the area will be immediately and negatively impacted. In addition, there will certainly be an immediate market devaluation of all of our properties which will amount to considerable financial loss.

Thank you for your attention to this matter,

David Strausz  
Suzanne Strausz

722 South Phillips Road  
Mabton, WA 98935  
strausz@bentonrea.com