



Friends of Toppenish Creek

November 1, 2021

Dear WA State Dept. of Fish and Wildlife,

Thank you for considering these comments from the Friends of Toppenish Creek, a 501 C (3) nonprofit organization in Yakima County, regarding your Puget Sound Chinook Conservation and Rebuilding Scoping Document.

Friends of Toppenish Creek is dedicated to protecting the rights of rural communities and improving oversight of industrial agriculture. FOTC operates under the simple principle that all people deserve clean air, clean water and protection from abuse that results when profit is favored over people. FOTC works through public education, citizen investigations, research, legislation, special events, and direct action.

Frequently people from the eastern side of the state complain about westsiders telling us how to live. Today FOTC is happy to return the favor, because we too are concerned about the survival of salmon runs in Puget Sound, and as a corollary survival of People, Orca Whales and Wildlife in general.

FOTC knows a few things about the interface between agriculture and nature that we now share. In brief, FOTC advises the Dept. of Fish and Wildlife to recognize the value of strong National Pollutant Discharge Elimination System (NPDES) permits for concentrated animal feeding operations (CAFOs) in protecting the purity of surface waters. WA State agencies must work cooperatively and seize every opportunity to protect aquatic life. If the WA State Dept. of Ecology writes strong NPDES permits then pollution of the rivers and streams decreases, and salmon will be better able to survive and thrive.

Nowadays farm animals such as cows are managed in confined animal feeding operations. Cows produce large volumes of feces and urine, and when thousands are confined to a few acres of land, managing their waste becomes a logistical and environmental nightmare.

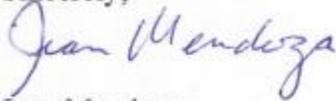
Farmers are advised to store manure in lagoons during the winter and apply to crops during the summer. If the manure lagoons are improperly lined, nutrients such as nitrogen, along with veterinary pharmaceuticals and other chemicals, leach to the underlying groundwater. It has been shown that there is a dynamic connection between groundwater and surface water. When manure lagoons are located near rivers or in flood plains, runoff is a constant threat. Particulate matter in

manure is fine and contributes to sediments that can cover spawning grounds and reduce oxygen to eggs, alevin, and fry.

In Washington State most CAFOs are dairies. Dairies are common in Whatcom, Skagit, and Snohomish Counties. According to the Puget Sound Nutrient Synthesis Report, Part 2, “Puget Sound has areas of low dissolved oxygen that do not meet Washington State Water Quality Standards due to the influence of excess nutrients from anthropogenic sources.” And “The Snohomish and Skagit Rivers have the highest overall total nitrogen loads into Puget Sound. The Stillaguamish, Nooksack, and Snohomish Rivers have the highest total nitrogen yield (load per unit area).”

Strong NPDES permits can reduce the impact from CAFOs by 1. Requiring synthetic liners for manure lagoons, and 2. Requiring healthy buffers along rivers and streams. Strong NPDES permits for CAFOs will go a long way toward restoring the purity of surface waters in our state and bringing back the salmon. Ecology is currently re-writing those permits. Please use your influence with Ecology and support the strongest permits possible.

Sincerely,

A handwritten signature in blue ink that reads "Jean Mendoza". The signature is written in a cursive style.

Jean Mendoza

Executive Director, Friends of Toppenish Creek
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