



Friends of Toppenish Creek

July 23, 2025

Dear Yakima Regional Clean Air Agency,

Recently the Friends of Toppenish Creek submitted a public records request for copies of dust permits for heifer operations submitted by the DBD/SMD heifer feeding operation in Outlook, WA. It appears to FOTC that the DBD/SMD permits are incomplete.

The YRCAA Fugitive Dust Control Guidelines and Best Management Practices for Confined Heifer Replacement Feeding Operations requires:

What must be in a Dust Control Plan?

- A map or drawing of the operation – [There is none for DBD](#)
- A description of the operational capacity of the operation including the number of cattle which could be confined – [Not part of the DBD Dust Plan](#)
- A description of water available for dust control. This description should include the source and quantity of water available and any permit or other limitations which would impact the operation's ability to employ water application as a BMP.

[DBD states in their permit: "Using BMP available to heifer operations, we will minimize the use of water for dust control as it negatively affects the animal's health. A wet Environment is not conducive for healthy young stock. If the situation arises that water is a necessity, the Ranch has water rights to supply its need and may also draw from other sources, depending on water availability."](#) This is the sum total of DBD's description of water available for dust control.

There are no sprinklers on the DBD heifer ranch. During winter months heifers wade through wet manure which brings into question the operation's concern for animal welfare and compatibility with the statement that wet conditions are detrimental to animal health.



A description of BMPs to be used under the plan.

- Which BMP or BMPs will be used, where they will be used, and to what percentage of the facility they will be applied – [Not part of the DBD Dust Control Plan](#)
- A description of the equipment and materials to be used, including a description of the normal operational capacity or application rate of any equipment - [Not part of the DBD Dust Control Plan](#)
- An operational plan for implementing each BMP. The operational plan must describe the criteria the operation will use to determine when to implement each BMP and

the criteria for selecting application rates, if applicable - [Not part of the DBD Dust Control Plan](#)

- Examples of criteria include pen conditions, recent weather, forecasted weather, and cattle management program - [Not part of the DBD Dust Control Plan](#)
- A detailed operation plan for feed processing and handling that minimizes dust for hay chopping, grain processing, feed mixing, and feed handling - [Not part of the DBD Dust Control Plan. DBD states that they do not chop hay, process grain or mix feed on site. However, the operation does handle feed and does feed heifers at the site.](#)

Best Management Practices

- Fixed Water Application – Sprinklers – [There are no sprinklers on the heifer ranch](#)
- Mobile Water Application – Water Trucks – [Not documented in the DBD Dust Control Plan](#)
- Pen Maintenance – Remove excess manure. An operation must have an appropriate place to store or dispose of manure removed from pens – [DBD does not remove manure from heifer pens for years at a time. The manure is simply stacked up in the center of pens. Currently manure piles are huge.](#)
- Surface Amendments/Applications – [The DBD plans states, “The feedlot uses straw or shavings for corral bedding only during the winter months, as necessary.”](#)
- Wet Manure/Mound Management – [This may be the BMP utilized by DBD. For this operation wet manure/mound management means piling manure into mounds that become hills in the center of pens. The manure accumulates for years at a time and reaches heights of 10 to 15 feet. How can this protect air quality?](#)
- Windbreaks – [There are no windbreaks on the DBD/SMD heifer ranch.](#)
- Feed Processing and Handling BMPs – [None described.](#)

Here is a copy of the most recent DBD/SMD Dust Control permit application from July 2, 2025 in its entirety. See for yourself whether the permit meets the requirements in the YRCAA Fugitive Dust Control Guidelines and Best Management Practices for Confined Heifer Replacement Feeding Operations, available at [Microsoft Word - policy_Confined Heifer Replacement_2009.doc](#) . FOTC alleges that the permit does not.

DBD Washington, LLC Heifer Raising Facility (SMD)

Introduction

DBD Washington, LLC has prepared this Fugitive Dust Control Plan as part of its ongoing efforts of using Best Management Practices (BMP's). The goal of the Plan is to control fugitive dust through planning, utilization and evaluation of the best management practices as described in the Plan.

Description of the Heifer Facility/Operation

Our Second heifer lot is located at 211 Nichols Rd, Outlook, Washington. The feedlot is approximately 35 acres and is currently used to raise young Holstein calves, ranging in age from 1 day old up to springer heifers. There is a 15 mph speed limit imposed throughout the facility.

Dust Control Management Plan

Effective Dust Control:

The feedlot will control fugitive dust throughout the year by minimizing dry manure in the corrals and high traffic areas by (1) scraping wet manure into the corrals and high traffic areas; (2) replenishing mounds; and (3) scraping corrals as needed. This is a highly effective management practice and is done with skilled precision. The feedlot employees will regularly inspect the facility to assess dust issues and will respond promptly with appropriate dust control practices outlined in the Plan.

Maintenance:

The feedlot will use cross-fencing as a last resort to control fugitive dust. The cross-fencing will be utilized based upon management's decision and analysis of weather conditions. If sufficient amounts of moisture remain from winter/spring months, the cross-fencing may not be a viable option. A heifer feedlot cannot tightly confine animals in the same way as a cattle feedlot (for fattening animals for food consumption) because it is not holding cattle for short-term slaughter. Instead, the heifer feedlot raises animals to maturity for breeding and milking. The long-term herd health of the calves and heifers at our facility depends on allowing a certain amount of movement and controlling moisture, if possible. Pen sizes vary at feedlot, our smallest pen measures approximately 160' x 180'. Our biggest pen measures approximately 200' x 280'.

This size of pen minimizes calf movement, but at the same time, allows for healthy calves. The timing of the cross-fencing is determined by precipitation and weather conditions, and is typically used during the summer months, but if alternative methods are available, they will be utilized before this option.

Using BMP available to heifer operations, we will minimize the use of water for dust control as it negatively affects the animal's health. A wet environment is not conducive for healthy young stock. If the situation arises that water is a necessity, the Ranch has water rights to supply its need and may also draw from other sources, depending upon water availability.

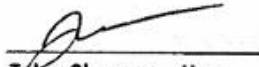
**DBD Washington, LLC
Heifer Raising Facility (SMD)**

Feed Processing/Handling:

The feedlot does not process grain. Instead, heifers are fed a high forage grain mixture, delivered by feed truck to the animals. The grain is located at 501 chute Rd, Outlook WA 98938. The feedlot uses straw or shavings for corral bedding only during the winter months, as necessary. None of these activities generate fugitive dust that leaves the feedlot premises.

Conclusion

DBD Washington, LLC will regularly evaluate the effectiveness of its dust control plan, refining the best management practices contained in the Plan with science and veterinarians. Based on our evaluation of the Plan, the feedlot may modify the Plan to improve its effectiveness. If modifications are made to the Plan, the feedlot will advise the Yakima Regional Clean Air Authority of those modifications. Yakima Regional Clean Air Authority should notify the facility operators if it has any concerns with the Plan or modifications to the Plan.


John Glessner, Mgr.

7-2-25
Date

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Sincerely,



Jean Mendoza

Executive Director, Friends of Toppenish Creek