

ERTS Complaint 2 August 2022

Dear Environmental Risk Tracking System,

This is a complaint that the Klompe & Frieslandia Dairies discharge pollutants into groundwater near 650 Hornby Road, Sunnyside WA. They have done this for some years and continue to do so.

This complaint is based on the approximate number of cows in the pens at Klompe and Frieslandia, the amount of nitrogen produced by each cow per day, and the failure of Klompe/Frieslandia, Ecology or WSDA to determine where that nitrogen ends up.

Based on a casual count of cows in snapshots from Google Earth, there are at least 3,000 cows in pens that cover about 150 acres north of Stover Road and west of Hornby Road.

Here are two aerial photos of the operation from Google Earth:





Each milk cow produces about 1 lb. of nitrogen per day in urine and feces.<sup>1,2</sup> Over half of the excreted nitrogen is in urine.<sup>3,4</sup> For purposes of discussion let's say half.

Doing the math gives us:

Number of cows x nitrogen per day x  $\frac{1}{2}$  = nitrogen excreted in urine

$3,000 \times 1 \text{ lb per day per cow} \times \frac{1}{2} = 1,500 \text{ lbs of nitrogen per day produced in urine}$

The WSDA estimates that 35% of the nitrogen from a dairy production area is volatilized<sup>5</sup>. So, we have approximately 1,000 lbs of nitrogen per day unaccounted for.

The nitrogen in urine cannot be captured by manure solids separation or flushing into a lagoon. There are no flush systems in pens and corrals. Choices are:

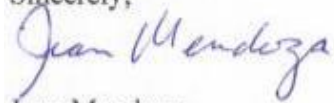
- Further evaporation
- Runoff
- Absorption into the soil beneath the drylot

Based on these numbers – 1,000 lbs of nitrogen per day is unaccounted for – the Klompe and Frieslandia Dairies discharge pollutants into the groundwater.

This is a request for investigation and remediation by Ecology and WSDA.

Thank you in advance for doing this.

Sincerely,



Jean Mendoza

Executive Director, Friends of Toppenish Creek  
3142 Signal Peak Road  
White Swan, WA 98952

<sup>1</sup> Ninth Circuit Court (2015) Order RE Cross Motions for Summary Judgement. CARE v. Cow Palace, page 44/111. Available at <http://charlietebbutt.com/files/CP/320%20-%20Order%20Granting%20in%20Part%20Mtn%20for%20Summary%20Judgment.pdf>

<sup>2</sup> Lower Yakima Valley Groundwater Management Area (2019) GWMA Final Report. Volume I, page 25. Available at <https://www.yakimacounty.us/DocumentCenter/View/22177/GWMA-VolumeI-July2019>

<sup>3</sup> Rotz, C. A. (2004). Management to reduce nitrogen losses in animal production. Journal of animal science, 82(suppl\_13), E119-E137. Page E132. Available at [https://www.researchgate.net/profile/Ca-Rotz/publication/8243583\\_Management\\_to\\_Reduce\\_Nitrogen\\_Losses\\_in\\_Animal\\_Production/inks/549af0830cf2b803713716b2/Management-to-Reduce-Nitrogen-Losses-in-Animal-Production.pdf](https://www.researchgate.net/profile/Ca-Rotz/publication/8243583_Management_to_Reduce_Nitrogen_Losses_in_Animal_Production/inks/549af0830cf2b803713716b2/Management-to-Reduce-Nitrogen-Losses-in-Animal-Production.pdf)

<sup>4</sup> Agricultural Waste Management Field Handbook. Chapter 11, Figure 11-9, page 11-17. Available at <https://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=34422.wba>

<sup>5</sup> Lower Yakima Valley Groundwater Management Area (2019) Volume I, page 25. Available at <https://www.yakimacounty.us/DocumentCenter/View/22177/GWMA-VolumeI-July2019>