Why a Full EIS should be Required for this Project

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1. Bait and Switch: Applicant really wants to do what he applied for in 2015

- The original application, using the basic numbers provided, and normal age class structure, was intended for over 50,000 animals
- The need to de-populate his 5 Yakima County Dairies is more pressing than ever
- The unusually high mortality rate in all age classes is a strong indicator of this
- Yakima County should require a full EIS to allow a much fuller and more accurate study of local impacts for the real, FULL build out

Continuous Violations of WAC 16-25-025

- WAC 16-25-025 (d.) Each burial site is limited to one livestock animal weighing more than one thousand pounds
- There is a mass grave established in late 2015 which I estimate contains the remains of over 1,000 animals in an area of less than 2 acres
- This mass grave also contains old PVC pipes and construction debris, a clear violation of WA DOE dumping/burial of waste materials
- The applicant has been previously investigated and cited for these same offenses

July 14, 2016 photo of Mass Grave



February 19, 2017 Aerial Photo



This site is directly up-gradient from a housing cluster. Most residents have shallow wells.



Is this the behavior Yakima County rewards?



These Applications took place in late February on top of 2' of snow and freezing rain!



Desparate? Out of storage? NO.



Applicant claims to preserve and protect rare shrub steppe habitat. Mowed 175ac to the dirt 5-

24-15



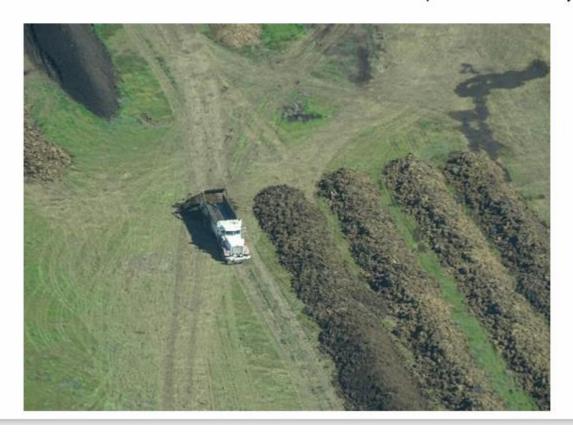
Applicant claims road access to the West – Glade Road will be primary. Last 18 months 90+% from a new access on the NE corner via new bridge



Here is the new concrete bridge, true primary access to the new facility. Why deceive?



Applicant has been dumping several thousand truck loads of manure on this site (not compost)



Over 400 loads of manure stored without turning over 180 days in 2016 on this site



4-16-15: Applicant stores manure on a 4+% slope; 20' at bottom from wellhouse



Applicant promises to <u>prevent track out;</u> this is their version of no track out



Why in the world would Yakima County NOT require a full EIS review, given this history?

- Words are nice; history is the best guide looking forward when trying to estimate the applicants behavior and likelihood to comply with a MDNS issued by the County
- The issues raised here are clearly at the level that should trigger
 Yakima County Planning to order a full EIS by the applicant
- A recently discovered, SENIOR water right application on an adjoining parcel may be impaired by the two new wells drilled by Veldhuis