

8 May, 2017

Dinah Reed, Senior Project Planner
Yakima County Planning Division
128 N. 2nd St.
Yakima, WA 98901

Re: Proposed MDNS - Case No. - CUP2016-00019/SEP2016-00007

Att:

- 1) – David Strausz letter, dated 19 April, 2016 – Comments on CUP2016-00019/SEP2016-00007
- 2) – David Strausz letter, dated 26 August, 2015 – Comments on EIS Determination of Significance, CUP2015-00036/SEP2015-00015
- 3) – David Strausz letter, dated 3 June, 2015 – Comments on CUP2015-00036/SEP2015-00015

Dear Ms. Reed:

We are writing in response to the recently received Preliminary Threshold Determination - Mitigated Determination of Non-Significance for CUP16-19/SEP16-7 dated 25 April, 2017.

We oppose in the strongest way the MDNS designation as proposed. While we have not had time due to the short notice received to study any of the county's documentation in support of this proposal, the mitigation proposed falls very short of providing assurance that any of the concerns which we have previously expressed about likely negative impacts of this project will be alleviated. We point out that the original CUP15-36/SEP15-15 for this proposed CAFO received a Determination of Significance requiring an EIS. Applicant's response was to file a new CUP/SEP making only cosmetic and incremental changes which we strongly feel do not materially change the probable environmental impacts of this project and should therefore still require a full EIS.

One of the primary concerns regards probable impacts to ground and surface water contamination and depletion. Of course a Nutrient Management Plan, per Mitigation Measure A1, should be required for any CAFO of this nature. Our concerns are mainly due to 1) the inability of any economically feasible practices to mitigate the likely effects and 2) the documented history of this operator over the last 10 years of flagrant disregard for compliance with regulations.

All of the mitigation measures proposed are merely a listing of what should be best practices for all CAFO operations. A major theme of our objections is that we feel that this project site in particular is so unsuited to the proposed CAFO project as to require extraordinary mitigation in order to reliably insure against permanent and egregious damage to neighbors and the environment generally.

As we have pointed out to the county previously, the operator has been, and continues, using the proposed site property for massive dead cow disposal and stockpiling of raw manure, apparently without any permitting or regulatory oversight. The dead cow necropolis now contains many hundreds of dead cows. The operation is now storing a second year's worth of manure from his Highway 22 dairy, a process that has littered the hauling route with manure, which as it dries is being kicked as dust into the air.

Last week the lower valley experienced severe thunderstorm activity, in which several local weather sites recorded very heavy and concentrated precipitation rates. This created mud flows and flash floods in a location only a few miles from the proposed CUP site that deposited a foot of mud in areas and washed out sections of a county road. This is one of the dangers that we have previously pointed out that could easily overload any measures to keep manure and contamination on the proposed site.

We feel that the serious consequences to residents of Yakima County means that the County would be negligent to not require a public hearing for the presentation of evidence by all interested parties before acting to approve this CUP request. We therefore strongly request such a hearing.

Attached are copies of the comments submitted by us over the last two years addressing in detail our concerns about this proposed CAFD. These concerns have not been sufficiently addressed in this time, and certainly are not alleviated by the insufficient measures outlined in the proposed MDNS.

Sincerely,

David A. Strausz

Suzanne J. Strausz

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