

August 17, 2009

Mr. Robert Koster  
WADOE – Eastern Regional Office  
Air Quality Program  
4601 N. Monroe St.  
Spokane, WA 99205

Dear Mr. Koster,

Please accept this letter as official public input and protest regarding Ecology's Draft Air Quality Permit for the proposed Easterday Ranches Inc. feedlot in North Franklin County.

While attending the July 29, 2009 Department of Ecology public Air Quality meeting regarding the Easterday Ranches Inc. draft air quality permit, it became apparent that the agenda, as provided by Ecy, was woefully inadequate, providing no opportunities to enter statements into the record, only allowing questions from the audience. The "presentations" by Karen Wood and the consultants employed by Easterday Ranches, Inc. (who were never properly identified and whose credentials and qualifications were never mentioned), essentially turned what could have been a productive meeting into a dysfunctional Easterday Ranches Inc. advertisement at taxpayer expense. While the official Ecy Public Meeting Announcement mentions only the draft air quality permit as the subject of the meeting, the handout provided by Ecy at the meeting ("Easterday Ranches Water quantity and water and air quality issues July 29, 2009) also comments on Water Quantity and Water Quality issues, including the Peplot Water Right Transfer, the Stockwater Exemption, and the Stockwater Lawsuit. These comments are obviously not pertinent to AQ issues and as such are inappropriate in the context of an AQ meeting, violating Ecy's own rules of meeting content. All in all, an unprofessional presentation and a waste of time and taxpayer's money.

The statement by Karen Wood regarding Air Quality (AQ) monitoring reflecting Ecy's belief that monitoring, although technically practical and required of other industrial polluters, is not cost effective for Easterday is unacceptable, and implies that Ecy feels that area AQ and the health and safety of local residents is

secondary to maintaining Easterday's profit margin. When concerns were raised about monitoring potentially dangerous toxic emissions of hydrogen sulfide, ammonia, and methane, along with fugitive dust, Ms. Wood stated that the Particulate Monitor at the Mesa Elementary school 5 miles upwind of the proposed feedlot would be adequate to detect any toxic emissions, even though the Mesa monitor can detect only particulate matter – not noxious gasses. With no on site monitoring, recording and reporting pollutant levels is also impossible. The suggestion made by the Easterday consultants and Ecy that local residents could 'just contact Easterdays' to report any emissions is totally unacceptable as a substitute for scientific monitoring and is as futile as a fox guarding a henhouse. Moreover, this subjective "EENT" (Eyes, Ears, Nose and Throat) monitoring puts local residents in the position of doing Ecy's job for it and is equally unacceptable.

Pollutants, odors, and other discharges from the Easterday CAFO must be considered as part of the cumulative total of pollutants already being released by large dairies, other feedlots, and chicken farms in the surrounding area. A comprehensive list of these CAFO's is available through the Dept. of Agriculture. From my homestead on Stastney Road, depending on wind direction, I can easily smell the Coulee Flats Dairy on Pepiot Road, the Oakdell Egg Farms CAFO's on Sagemoor and East Sagemoor Roads, and the 5 D Farms dairy in Smith Canyon south of East Elm Road. Many residents in the Eltopia area have remarked that they are offended by these putrid odors also, and are concerned about the pollutants these odors represent. When questions were raised at the meeting about direct Biological Oxygen Demand testing and Sanitary Lagoon Aeration as BMP's of detecting and controlling the release of potentially harmful and dangerous pollutants, these methods were dismissed as being too expensive for Easterday to employ and still maintain a high profit margin, again indicating that the safety of local residents and their environment is secondary, in Ecy's and the developer's opinion, to Easterday's profits. I maintain that, in order to protect the public and the environment, BMP's such as direct BOD testing and SLA, not proxies, must be utilized to detect and control noxious emissions, despite the cost – just as other industrial emitters are required to do.

The recent discovery of West Nile virus positive mosquitos in samples taken near N. Drummond Rd., Pioneer Rd, and Pumphouse

Rd in N. Franklin County also raises questions that inadequate control of emissions, airborne and otherwise, from the proposed Easterday feedlot could create conditions favorable to mosquito infestation and, therefore, contribute to the development of actual West Nile disease in the surrounding area.

In closing, I would like to comment that Ecy's role throughout the Easterday Ranches Inc feedlot application and permit process has been one of collaboration with the developer and facilitation of his plan, regardless of legitimate complaints and objections from many concerned area residents. It is apparent that Ecy's agenda regarding this proposal is to push the application and permit process through regardless, using the law when convenient, and ignoring it when inconvenient. It is also apparent that on the occasions when Ecy staffers have disagreed with Easterday's feedlot plan they have been pressured by their superiors to withdraw their objections and facilitate the developers' plan. Truly an example of the application of 'privileges and immunities'. I would also like to take this opportunity to request feedback regarding this letter and the issues addressed in it. I look forward to hearing from you.

Sincerely,  
Randy Jones  
Treasurer, Five Corners Family Farmers  
Owner, C&R Ranch