

February 12, 2019

To: Washington State Department of Ecology
PO Box 47600
Olympia, Washington 98504

Attention: Peter Lyon
Solid Waste Management – Southwest Regional Office Section Manager

Subject: Fire Mountain Application for Biosolid Permit in Yelm WA

Dear Mr. Lyon,

Please count me as one of the Yelm/Thurston County citizens vehemently opposed to Biosolids being spread in Yelm. I demand you shall withdraw the Determination of Non-Significance for the Fire Mountain Biosolids Permit Application for reasons stated in my letter.

I have been an organic farmer since 1995 dedicated to the preservation of small family farms and protecting our food supply. I currently am a licensed WSDA Food Processor and make and sell my product line to the Yelm Food Co-op, at farmers markets, and online.

My daughter, Mari, has become the farmer in the family with her husband, Tim. They are WSDA Certified Organic and lease 3 acres from Nisqually Springs Farm at 17835 State Route adjacent to Stewart Meats. This property is the home of two WSDA Certified Organic farms and borders the Nisqually River on one side and the Centralia Diversion Canal on the other side. It is a DIRECT HIT from the proposed biosolids dumping site. The spreading of toxic municipal sewage sludge above their location will put them out of business and leave the community who depends on their safe organic food without a source. Nisqually Springs Farm beef is Certified Organic. I don't think Sludge Burgers would sell very well, and I bet you wouldn't want to feed them to your family either. By allowing this permit you are endangering the health and well-being of our entire community. Please show me the Department of Ecology values the health and well-being of our community, it's land and air above special interests.

Purchasing local certified organic produce for my product line is the mainstay of my business. If you permit the spreading of biosolids this would contaminate their production with potential contaminants that would render it no longer certified organic nor desirable and dramatically negatively affect my local organic food business. Mari's Farm has developed a reputation for extraordinary clean exceptionally delicious produce which is much sought after. Your allowing this permit to spread biosolids upstream from them would destroy their business from so many angles.

While denying this permit seems like common sense to me as there are so many issues and concerns that must be obvious to you, I demand that you shall withdraw the Determination of Non-Significance based upon the additional following concerns:

1. Wildlife and threatened species need to be addressed in an EIS, including the endangered pocket gopher to name only one.

2. There needs to be a wetland study.
3. Misrepresentation regarding drainage impacts to surrounding water bodies.
4. No mention of a 10-acre adjoining lake on next lot.
5. No mention of Wheeler Creek that drains off the SW corner of ranch, runs at significant volume 6-8 months of the year parallel to the former irrigation ditch and dives and disappears into the aquifer directly west of Bald Hill Road.
6. The site contains extremely porous soils – the problem relating to contaminant leeching is not with water being too high, but with water immediately falling to aquifer levels and traveling subsurface towards the NW.
7. Aquifer recharge contamination threat to downstream city water, organic farms and an estimated 24,000 acre feet per year downstream springs going into the Nisqually River.
8. No professional citation regarding bio-accumulation of contaminants/chemicals/pollutants in soils on site and the amount that will be mobile as transported downstream through the prairie aquifer system and into the 'Macallister water model'.
9. Allowing bio-accumulation of contaminants in a known critical area of aquifer recharge sub-surface gradient for drinking water used by a large population (including a municipality) is a violation of the government's primary duty to protect the public health, safety and welfare (the public trust doctrine) and therefore this proposal does not serve the public interest.
10. Site access and use restrictions.
11. No recovery management from odors through the entire application season from up to 50 truck applications per day.
12. Traffic impacts, including significant increase in need for road maintenance, a burden to be put on Yelm City and Thurston County. Yelm's city and rural traffic is already significantly congested. The thought of adding up to 50 trucks is not feasible and absurd.
13. Noise from truck traffic.
14. No adequate attention has been paid to answer questions raised about disposal of radio-active waste possibly contained in biosolids as mandated in RCW 70.105.050.
15. Conflicting parcels, acreages, application locations depicted in application documents.
16. No alternatives offered to this project as exemplified in RCW 70.105.150 and as required under RCW 43.21C.030(2)(e).
17. Permitting agency did not act impartially at the January 24, 2019 public hearing; they unfairly acted in support of the proponent instead of taking a neutral position.

For the record, what needs to be done is a two-pronged approach. STOP soil, water and air quality destroying activities like spreading municipal sewage sludge and START finding and implementing solutions to building soil, sequestering carbon and neutralizing municipal sewage sludge. You have some very skilled, available and willing community members here to assist you with this. Let's all get together for a brainstorming session on solutions. I would be willing to organize this meeting if you would like? It could be held at the Yelm Community Center where they have a state-of-the-art facility with drop down screens to hold a professional meeting.

The Washington State Department of Ecology could become a biosolids solutions' model as this is a worldwide issue of major concern.

Thank you for your full consideration to these matters.

Sincerely,

Susie Kyle
308 E. Yelm Avenue
PMB 5
Yelm, WA 98597