

August 22, 2018

To Whom It May Concern:

The Friends of Toppenish Creek is a 501 (C) 3 non-profit environmental group located in south Yakima County.

*Friends of Toppenish Creek is dedicated to protecting the rights of rural communities and improving oversight of industrial agriculture. FOTC operates under the simple principle that all people deserve clean air, clean water and protection from abuse that results when profit is favored over people. FOTC works through public education, citizen investigations, research, legislation, special events, and direct action.*

We take this opportunity to inform Ecology and the Environmental Protection about serious air quality issues in the Lower Yakima Valley.

In Yakima County the Clean Air Act is enforced by the Yakima Regional Clean Air Agency (YRCAA). South Yakima County is home to 35% of all Washington dairy cows. There are about 100,000 milk cows plus an equal number of support animals in a 273 square mile area. The dairy industry brings to the area significant air pollution in the form of fine particulate matter (PM 2.5) that is formed from ammonium and nitrate emissions, plus dust (PM 10) that is generated by the animals in pens and the turning of manure compost.

We do not believe that Table 5 in Ecology's document *Exceptional Event Demonstration for September 2017 PM10 Exceedances Due to Wildfires* provides an accurate description of the anthropogenic source emissions for the Lower Yakima Valley. We believe that this table under-reports emissions of reactive nitrogen and dust from dairy operations.

In 2013 and again in 2017 FOTC and others petitioned the YRCAA to ban spraying of manures into the air or broadcast spreading of manures during inversions and burn bans. YRCAA rejected our petition. Consequently dairymen are free to add to the already dangerous levels of particulate matter in the air during adverse air events. The wild fire events that are under discussion here are stark examples of the dangers to human health when airborne particulates reach certain levels.

To be very clear: The wildfire events of September 5, 6 and 7, 2017 led to hazardous air quality for the people of south Yakima County. The agency with a mandate to protect the people could not do very much about the wildfires. However, they had the power to prevent addition of more significant pollution and they failed to do so.

Thank you for hearing our plea.

*The Friends of Toppenish Creek*



Dust from a Manure Composting Operation in South Yakima County, 2016