

W Thomas Soeldner

I am a retired educator, consultant, and clergyman. For the past fifteen years, I have worked with communities and organizations to help them address environmental issues. I have training in natural systems and in helping human beings and their organizations find their place within healthy and sustainable natural systems. I am also a long-time member and activist with the Sierra Club. I have serious concerns about the dangers to community water resources from CAFOs.

SEPA recognizes that "each person has a fundamental and inalienable right to a healthful environment and ... each person has a responsibility to contribute to the preservation and enhancement of the environment." Under SEPA Ecology must "fulfill the responsibilities of each generation as trustee of the environment for succeeding generations" and assure for all people of Washington safe, healthful, productive, and aesthetically and culturally pleasing surroundings." Furthermore, under SEPA, Ecology must complete an EIS for the draft CAFO general permit.

In fact, Ecology issued a DNS without sufficient information in the face of clear probably significant adverse impacts to the environment, and Ecology violated SEPA's mandate and the requirement to complete an EIS. Ecology's violation of SEPA in the context of the draft CAFO permit harms our environment and violates Ecology's fundamental duty as an agency tasked with protecting our air and water for current and future generations. I urge Ecology to withdraw the DNS, issue a DS, and complete the mandated EIS.

Over the last ten years, I have spoken with small Eastern Washington farming families living near CAFOs or heard about them from others. In some cases, they have experienced a serious drop in water levels that have made it necessary for them to drill new or deeper wells, and several of them have experienced wells contaminated with the toxins CAFOs produce. Ecology has not regulated CAFOs as defined by the Clean Water Act nor has it followed the Washington State Court of Appeals' order to rewrite the Washington CAFO water pollution permit to protect Washington's waters from contamination and to take the climate crisis into account. Ecology must enact provisions requiring the use of modern pollution control technologies and practices in order to protect our communities.

As an eastern Washington State resident as well as a parent and grandparent of Washington State citizens, I call upon the Department of Ecology to rewrite and champion the necessary updates to the CAFO permits to improve the livability of our rural communities for all residents.

Thank you for the opportunity to comment on both the draft CAFO general permit and the associated SEPA DNS.

With hope for a Department of Ecology that practices and carries out its charge from the citizens of the state, I remain

Sincerely,
W. Thomas Soeldner
Upper Columbia River Group – Sierra Club
Valleyford, WA