

## Summary Comment on Draft Permit for Simplot Feedlot (Wallula/Burbank)

This summary highlights key concerns related to the Washington Department of Ecology's draft water quality permit for the J.R. Simplot Company's Wallula/Burbank feedlot, located in one of the state's most nitrate-impaired areas (Nitrate Priority Area No. 3).

1. **Groundwater Risks:** Water levels in 3 of 4 monitoring wells (MW-1, MW-4, MW-5) have risen 2.7 to 3.6 feet since 2002. Groundwater in this area is already high in nitrate, and water movement toward the Columbia River increases vulnerability. Ecology should investigate trends and ensure appropriate monitoring.
2. **Lagoons and Wastewater Management:** Ecology records and Simplot's hydrogeologic reports indicate many lagoons were unlined as recently as 2021. The final permit must require enforceable deadlines for lagoon lining, with public disclosure.
3. **Avian Botulism and Wildlife Exposure:** Botulism outbreaks linked to lagoon and groundwater conditions have caused mass bird die-offs. The facility lies on the Pacific Flyway and includes artificial water bodies that attract birds. Ecology should require deterrent and mitigation measures.
4. **Manure Management:** Simplot generates tens of thousands of tons of manure annually. In 2019, it reported over 90,000 dry tons generated. Ecology should require tracking of all offsite manure exports and receiving locations.
5. **Air Quality and Dust:** Dust from the feedlot can carry pathogens and agrochemicals miles downwind. The site lies within a historically PM10-impacted region. Updated and enforceable dust control provisions are essential.
6. **Cattle Counts and Capacity Transparency:** Ecology cites a "typical" head count of 40,000, yet internal data shows much higher figures, and the site's stated capacity has changed over time. Pen acreage has expanded. Ecology should require transparent reporting of manure volumes, cattle numbers, and pen space.
7. **Permit Enforcement and Public Access:** Simplot has operated under an Agreed Order since 2005. It is long past time for a modern, enforceable permit. Ecology should also centralize access to all compliance reports, lagoon data, and groundwater monitoring.

### Requested Changes:

- Add monitoring wells and independent hydrological review.
- Require enforceable lagoon upgrade schedules.
- Mandate full tracking of offsite manure transfers.
- Strengthen dust and air quality protections.
- Require wildlife exposure prevention and dissolved oxygen mitigation.
- Ensure data transparency and public access.

**Conclusion:** This facility presents long-term risks to water, air, and public health. The current permit must reflect those risks with enforceable, science-based requirements.

Thank you for your consideration.