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RECEIVED
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Kittitas County CDS

I am commenting and have questions regarding 3 Boots Ranch permit #(CU-23-00001) project proposed at 3200 Wilson Creek Road.

Me and my family live at 3410 Wilson Creek Road which is upwind from the proposed commercial slaughterhouse/meat processing plant. I have lived in the surrounding area for 42+ years, this part of Wilson Creek Road is mostly residential housing neighborhoods and farmland, no commercial slaughterhouse/meat processing plants are anywhere close to the proposed area of 3200 Wilson Creek.

I believe this type of project is a need in our community, but its location would negatively impact all surrounding property values, there are numerous studies showing this impact. People do not seek out to buy property next to commercial slaughterhouse/meat-processing facilities. There is no mitigation in 3 Boots Ranch's permits regarding the noise, smell, extra traffic, and run off that this project would create.

The name on the SEPA application of 3 Boots Ranch Custom Cuts isn't even the same one on the permit of CU23-00001 which is 3 Boots Ranch. How can you have 2 separate business names on the same project, one on the permit and a different one on the SEPA application?

With no plan to mitigate obvious impacts this project will be adding noise created from all the extra traffic and the 200 cattle dropped off per day would essentially create a feedlot that brings with it the impacts of odors, bugs, and extra run off to surface water.

These are not only public health, environmental health, neighborhood health, property value impacts, they are issues that have an overall negative impact on everyday life for those that will have to live around this commercial slaughterhouse/meat-processing facility.

The county should protect its current tax base, not just look to expand it at the cost of its long-time residents. Its bad county policy to take property values away from established residents.

Below are a list of comments/questions that will go into greater detail on the issues that this project creates for the neighborhood, if you have any follow-up questions, please do not hesitate to contact me.

Thank You

Jeremy Bach

#1

This commercial slaughterhouse/meat processing facility will ultimately change the character of the surrounding neighborhood by not addressing the smell created from a facility like this. In their revised SEPA checklist the answers to all the questions pertaining to air/emissions are essentially no and none created.

There is no mitigation for the damage to surrounding property values, in no.4 under conditional uses listed below it does state that, "The proposed use will mitigate material impacts of the development, whether environmental or otherwise." Their proposed plan does not list how they mitigate for these property value impacts created from their development, in fact there is no mention that it even exists.

These points alone demonstrate why no.1 and no.4 of the counties review criteria are not being met. Since these county criteria cannot be met this project should not be authorized a conditional use.

Chapter 17.60A

CONDITIONAL USES

17.60A.015 Review criteria.

The Director or Board, upon receiving a properly filed application or petition, may permit and authorize a conditional use when the following requirements have been met:

1. The proposed use is essential or desirable to the public convenience and not detrimental or injurious to the public health, peace, or safety or to the character of the surrounding neighborhood.

4. The proposed use will mitigate material impacts of the development, whether environmental or otherwise.

COMMENTS ON (REVISED) SEPA APPLICATION

#2

All commercial slaughterhouses/meat processing facilities produce odor, it's impossible not to especially in the summer when it gets hot, plus we do have wind in this valley, so everyone that is down wind in the summertime will have to endure with the odors created. There is no mitigation for this in their plan.

B. Environmental Elements (Answers from the SEPA checklist application on file)*answers in italic

2.Air

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Emissions from construction equipment during the construction phase. Once completed No Emissions.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

None

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

No a-typical emissions anticipated on site

#3

There is a ditch right next to Wilson Creek Road that the proposed project will be located. This ditch does flood from time to time especially during run-off time. Adding wash down facilities and slaughterhouse by-product water run-off to the grass field would add to possible flooding and excessive smell. In their SEPA checklist they answered no being next to this main ditch on Wilson Creek as you can see below.

3. Water (Answers from the SEPA checklist application on file)

a. Surface Water:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

None

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

No.

No. 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No

#4

With the volume of people expected to come in an out in a day the community water system should be a Class A system since it will be open to the public via bathroom facilities, ie: truck drivers, customers dropping off, customers buying, etc.

There wasn't a special septic or lagoon listed on the application regarding the disposal of animal waste, ie; waste from the slaughter house, wash-down areas, general contaminated water that is used from animal slaughter and processing carcass. Domestic sewages are not capable of handling high volumes of contaminated water and carcass waste created from a commercial slaughterhouse/meat processing facility.

I would hope that this gets addressed since it does impact public health and surface water run offs.

b. Ground Water: (Answers from the SEPA checklist application on file)

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

There will be a class B Commercial well connected with this project. It will be mainly used for standard drinking water, bathrooms and hand wash locations. There will be occasion wash downs for cleaning of facilities. All water used will go into standard approved septic systems. Amount of use will vary per day but should be in the range of standard household use

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Domestic sewage

#5

Once the hard surfaces, ie; asphalt etc., get added it will create more chance for contaminated water from the slaughterhouse to run-off down stream and get into the neighborhoods below of the main ditch next to Wilson Creek.

The SEPA application has no mitigation or measures to protect others from this contaminated slaughterhouse water run-off or from flowing into the main ditch that others downstream use.

c. Water runoff (including stormwater): (Answers from the SEPA checklist application on file)

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

The site is predominately farm ground pasture surrounding the facility. No storm runoff is anticipated to leave site.

2) Could waste materials enter ground or surface waters? If so, generally describe.

Not Anticipated. SEPA Environmental checklist {WAC 197-11-960) July 2016 Page 6 of 15

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.
No.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

None.

#6

There is no mitigation listed for the extra volumes of traffic that will be created once the project is completed. In the SEPA application under no.14 section F they answer that, **" 25 total vehicular trips a day with 80% employees too and from work and 200 cattle drop offs. No more than 6-8 Peak Hour Trips".** That is a lot of traffic added to Wilson Creek Road in a residential neighborhood. 200 cattle drop offs could mean many things, 200 individual drop offs etc; not very clear. If there is 200 cattle dropped off in 1 day as it states in their SEPA application there will be a ton of noise and waste created from 200 cattle being stored and processed in 1 day. What happens if these 200 cattle don't get processed in the same day they arrive, does this turn into a feed lot?

b. Noise (Answers from the SEPA checklist application on file)

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

N/A- Same as a standard household- Occasional delivery trucks

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

ShortTerm: Heavy equipment and general construction noise along with vehicle traffic.

LongTerm: Vehicle Traffic and cattle noise generally during typical commercial business hours. Operating hours:

M-Th:6:00AM—4:30 PM

#7

There is no mitigation regarding the extra traffic created from this project. 25 vehicular trips could mean semi-trucks starting at 6am with 200 cattle drop offs per day. This is a major impact to everyone on Wilson Creek Road.

14. Transportation (Answers from the SEPA checklist application on file)

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?

25 total vehicular trips a day with 80% employees too and from work and 200 cattle drop offs. No more than 6-8 Peak Hour Trips

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No.

h. Proposed measures to reduce or control transportation impacts, if any:

Non

QUESTIONS

1.How long will animals be housed at pens?

2.How many animals will be housed at the pens overnight?

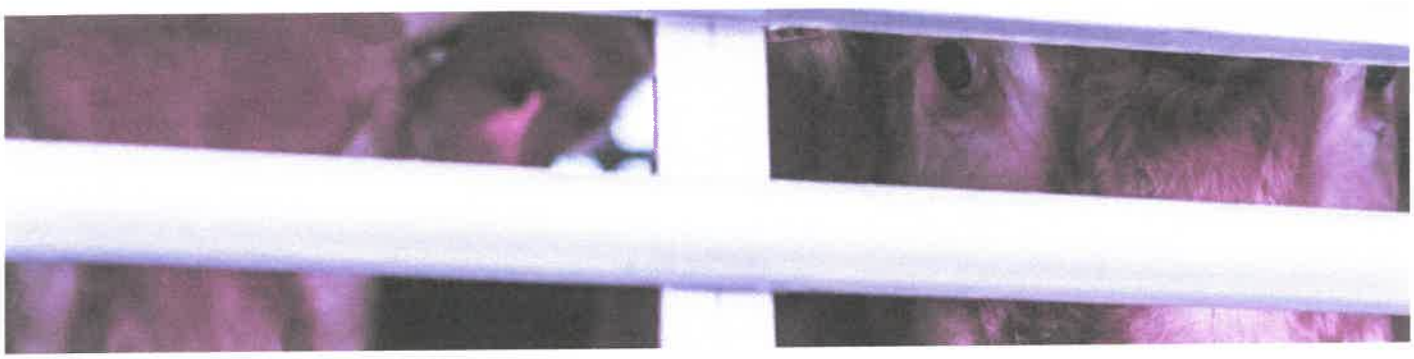
3.Will the holding pens end up being feed lots housing cattle for a number of days?

4.What are the future plans on expanding size. Will there be any other projects or spin off projects attached or related to this one?

5.As of 2/21/23 there is two 3 BR Custom Cuts SEPA checklist on file with different answers pertaining to amounts of cattle delivered per day. Both the SEPA checklists posted for public view say they were filed 1/20/23 and both signed and dated 1/27/23? How can you file the same document the same day with different answers? Seems a bit misleading.

6.How much water are they mitigating for consumptive use and how much are they discharging to the surface waters? According to a paper, which is attached, they say the water use to cut and slaughter a1cow is 150 gallons per-450 gallons per animal. If you take that water usage number and use the revised SEPA checklist answer of, **" 25 total vehicular trips a day with 80% employees too and from work and 200 cattle drop offs. No more than 6-8 Peak Hour Trips",** this could put their daily gallons per day of use at 30,000 gallons per day-90,000 gallons per day, using their number of 200.

THE ENVIRONMENTAL IMPACTS OF SLAUGHTERHOUSES: FACT SHEET



Slaughterhouses are a key source of water pollution and environmental degradation. Laws regulating these facilities are weak and poorly enforced, for the animals killed in the process, the workers putting body and limb on the line, and the environmental health and safety of neighboring communities. From direct disposal of pollutants to toxic runoff and water usage, slaughterhouses are significantly impairing North American rivers and streams and further endangering aquatic wildlife.

BY THE NUMBERS

Due to American demand for meat, the number of slaughter facilities is steadily increasing, with more than 900 livestock slaughter facilities operating under federal inspection, 3,000 federally inspected poultry and processing plants (some process meat but do not slaughter), and about 1,900 state-regulated or custom slaughter facilities.[1,2] Approximately 25 million farmed animals in the United States are slaughtered every day.

Per capita meat consumption in the United States is estimated at 222.4 pounds annually.[3] Approximately 9.76 billion farmed animals are processed per year into 105 billion pounds of beef, pork, chicken, turkey, mutton, veal and lamb. In 2021 that included 55.9 billion pounds of red meat processed, with a record high of 28 billion pounds of beef.[4] Poultry slaughter has nearly doubled in recent decades as chicken consumption has skyrocketed.[5,6] The steady increase in meat production and slaughter facilities means an increase in harms to the health of watersheds and wildlife.

WATER USE

Each year U.S. slaughterhouses use billions of gallons of water to process and render animal carcasses. For example, water use in processing red meat includes cleaning stockyard and pens, hide removal, scalding, dehairing, intestine handling, rendering, general cleanup, and meatpacking. Water used in these facilities is often contaminated with processing waste and disposed of into waterways.[7]

- For poultry slaughter, water usage occurs during scalding, de-feathering, evisceration, carcass washes, pre-chilling and chilling. Average water usage for slaughtering poultry is over 3.5-10 gallons of water per "broiler" chicken and 11-23 gallons of water per turkey.[8]

- For beef cattle, water consumption occurs in every step of the slaughter process, from live receiving to cleaning and sanitation. Average water usage for slaughtering cattle is at least 150-450 gallons per animal.[9]
- Slaughtering requires large amounts of water for cleaning and sterilization. The resulting wastewater contains concentrated agricultural compounds including fat, oil, protein and carbohydrates, which are biodegradable but require a high biological oxygen demand to biodegrade.
- The main polluting agent in slaughterhouse wastewater is blood. Wastewater also contains insoluble organic and inorganic particles polluting waterways.

POLLUTION

U.S. slaughter facilities produce millions of pounds of pollution annually. These facilities discharge water contaminated with blood, oil, grease and fats, ammonia, dangerous fecal bacteria, and excrement.

- In 2018 slaughterhouses released over 55 million pounds of toxic substances into waterways.[10]
- According to EPA data, meat and poultry processing facilities are the second-largest industrial point source of nitrogen into waterways, discarding 27%. [11,12,13,14]
- Slaughterhouses are also a top producer of phosphorus, generating 14% of the phosphorus discarded into waterways.[15]
- Environmental Integrity Project's study of 98 large slaughterhouse facilities found that the median slaughterhouse produced an average of 331 pounds of nitrogen a day, which is equivalent to the nitrogen pollutants in the untreated sewage of 14,000 people.[16]
- Slaughterhouse wastewater can contain antibiotic-resistant strains of E. coli, fueling the spread of antibiotic-resistant bacteria.
- Without a clear pretreatment standard, some slaughterhouses discharge to public wastewater-treatment plants without treating waste, worsening overflow at treatment plants.
- Even with new technologies available for mitigating pollution, the past two decades have seen an increase of over 25% in direct disposal of slaughter pollutants into waterways due to weak environmental protections.
- More than 60% of the waterways that suffer the pollution from the biggest slaughterhouses are too polluted for drinking, swimming, and fishing.[17]

SPECIES ENDANGERMENT

Many aquatic species are already struggling to survive in the face of climate change, drought and rising temperatures, bringing excessively low water, low oxygen, hotter water, and concentrations of harmful substances. Toxic algal blooms and chemical contamination added to existing pollution can destroy entire ecosystems. Poor oversight, regulation and enforcement of slaughter facilities — many of which have low environmental standards that are decades out of date — have created a significant threat to the survival of aquatic animals from this pollution.

- All 50 states face harmful algal blooms from nitrogen and phosphorus pollution that can sicken or kill people and animals exposed to these extremely dangerous toxins.

- According to the Environmental Protection Agency, slaughterhouses often dump wastewater directly into rivers and streams.

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