

From: [Barry Brunson](#)
To: [Kelly Bacon \(CD\)](#)
Cc: sage.park@ecy.wa.gov
Subject: Brown & Jackson SE-20-00003 proposal
Date: Tuesday, September 1, 2020 3:37:00 PM

Dear Ms Bacon,

I appreciate the opportunity to comment on the subject proposal. While I understand the value of reuse of liquid and solid human waste for agricultural and other purposes, it must be done in a responsible way, and I have doubts about this proposal. Primarily, the proposal seems clearly to be that of a (privately-owned, as opposed to municipal) sewage treatment operation, instead of a solid waste handling facility, as Brown & Jackson present it. My understanding is that this requires a different level of permitting.

Here are a few additional comments.

1) In the SEPA Environmental Checklist, under 3. Water, c. Water runoff, question 2 asks “Could waste materials enter ground or surface waters? If so, generally describe.” The Brown & Jackson response appears evasive, as they say only “It is not expected that waste materials will enter ground or surface waters.” Would it not be better if they provided specific plans and procedures for avoiding waste materials befouling ground and/or surface waters?

2) Open ponds inevitably would seem to attract both birds and land animals unless barriers are in place, and I could find no mention of such. The site appears clearly be within the Pacific Flyway, and the Migratory Bird Treaty Act would seem naturally to be relevant, but I could find no reference to the MBTA in the proposal documents. In fact, in the SEPA Environmental Checklist, under 5. Animals, c. asks “Is the site part of a migration route?”, and Brown & Jackson say “None Known”.

3) In the SEPA Environmental Checklist, under 2. Air, c. asks for “Proposed measures to reduce or control emissions or other impacts to air, if any.” The response stipulates that the septage will be disked into the land only once a year, and adds that this should minimize odors. Perhaps I’m being naive, but it would seem that odors would be likely to build up and increase over the course of a full year.

Sincerely,

Barry Brunson
380 Landers Lane
Cle Elum WA 98922