Toppenish School District No. 202

306 BOLIN DRIVE
TOPPENISH WA 98948-1644
PHONE (509) 865-4455
FAX (509) 865-2067

May 19, 2023

Via Electronic Delivery: Nickel.Brian@epa.gov

Ms. Susan Poulsom and Mr. Brian Nickel
Water Division, NPDES Permitting Section
US EPA Region 10
1200 Sixth Avenue, Suite 155
Seattle, Washington 98101

Subject: Public Notice Comments: NPDES Permit No. WA0050202
Washington Beef, LLC - Toppenish Plant

Dear Ms. Poulsom and Mr. Nickel:

I am writing to express my deep concern that newly proposed regulations for the Washington Beef processing plant in Toppenish, WA will negatively impact our region here in Eastern Washington. I appreciate that the Environmental Protection Agency has an important role to play in addressing water discharge issues, but those efforts should not be directed at a good actor that has coexisted with and supported our community for decades. Washington Beef is a valued neighbor and their consistent effort to implement best practices and maintain a sustainable operation has paid off as I understand the EPA has not cited violations or other problems with water quality to support the significant changes being proposed.

In addition to their strong environmental record, Washington Beef has also supported numerous local organizations and initiatives. As the Acting Superintendent of Toppenish School District, I have seen firsthand the significant role they play in the area, a role which will be jeopardized by EPA imposing new regulations, which far exceed the current Tribal water quality standards that have successfully protected the Toppenish community while allowing our economy to flourish.

I'm also concerned these new regulations are being applied to Washington Beef outside of the normal federal rulemaking process, and without adequate public input. Our community has too much at stake to handle this issue through a rushed process.

As a lifelong resident of Toppenish, I can attest that Washington Beef has been an important employer in our region for many years, providing stable and well-paying jobs to thousands of local workers, nearly all of whom are residents of Yakima County, WA, and supporting countless indirect jobs in our region and throughout the state. These jobs generate tens of millions of dollars in annual wages, disbursements, and employer paid benefits in an area of our state that will struggle to replace this economic output if Washington Beef is forced to close or relocate its plant because of the proposed regulations.

EPA's proposed changes in applicable water quality standards, which seem to be both unattainable and unnecessary, not only put Washington Beef and the Washington economy at risk, but it has the potential to

Toppenish School District No. 202

306 BOLIN DRIVE
TOPPENISH WA 98948-1644
PHONE (509) 865-4455
FAX (509) 865-2067

drastically impact our school system. Washington Beef has been a staunch ally and supporter of our District's efforts to provide a high quality education to our students as their employees have served on PTO's, Advisory Boards, and numerous District Committees, in addition to providing food for countless family events and a partner in promoting workforce development. Without their presence in our community, all of this support would cease and our students would suffer!

Not only would a loss of Washington Beef impact the daily operation of our School District, it would dramatically alter the size and scope of our District. These stringent regulations could lead to substantial job losses within Washington Beef, which would prompt families to leave the area in search of employment opportunities elsewhere. As a result, our District enrollment would significantly decline, leading to reduced funding and resources for our schools making an already challenging job much more difficult.

In addition, our District would be forced to reduce our staffing levels thus causing additional good paying jobs in our town to vanish. So, the implementation of the newly proposed water discharge rules would not only impact jobs at Washington Beef but in our District as well. These jobs serve as the backbone of our local economy, providing stability and financial security for individuals and families. When these jobs disappear, a domino effect could ensue, triggering a decline in consumer spending, reduced tax revenue for public services, and a weakened local economy overall. Moreover, the departure of skilled workers can lead to a "brain drain" effect, where talented individuals seek opportunities elsewhere, leaving the town with a diminished talent pool. This not only hampers economic growth but also undermines community morale and social cohesion.

Beyond the impact on employment and the local economy, we would lose a critical community partner that has been committed to making our region a better place to live, work, and educate the next generation of our Nation's leaders. I urge you to reconsider the draft Permit and work with Washington Beef to identify more sustainable solutions in line with how the facility has been regulated historically. This would continue to protect our environment while also preserving the economic and social benefits that the company provides to our community.

It causes me great concern as I attempt to comprehend the impact of losing Washington Beef in our town. It truly would be devastating! There would either be a mass exodus of families as they search for livable wage jobs elsewhere or an exponential growth in poverty. Either is not only nerve-wracking, but downright scary!

Thank you for the opportunity to submit these comments relating to Washington Beef's NPDES Permit, which are intended to be part of the Administrative Record. Please consider my views on this important issue.

Sincerely,

Shawn A. Myers
Acting Superintendent