May 25, 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 submitting this letter to share my concerns about the new standards for the Washington Beef operations that have been created through a permit and not through the regular rulemaking process. Washington Beef is well known for producing the highest-quality beef through their multiple brands including Snake River Farms American Wagyu Beef, St. Helens Beef, St. Helens Premium Angus Beef and Double R Ranch Northwest Beef. These newly created standards in the permit could negatively impact our customers and the quality beef we provide for them in our supermarkets. Washington beef is a major supplier of beef for Rosauers supermarkets and anything that threatens to increase costs and/ or limit choice for our customers is a risk to our company and community. I ask that the Environmental Protection Agency and their technical experts go through the process of working with Washington Beef to create standards that are doable so the company can remain viable and sustainable.

As a long-time customer, and business partner, I have witnessed firsthand Washington Beef's dedication to quality and their commitment to environmental consciousness and to doing the right thing. They have consistently demonstrated their commitment to maintaining high standards in their operations, which has resulted in a positive impact for their local economy, employment opportunities, and processing opportunists for hundreds of ranching families.

Any new regulations should consider the longstanding positive contributions Washington Beef has made in Washington and around the country. Washington Beef is a key part of the economy in the Northwest and a counterbalance to the major packers that already dominate the beef-packing industry.

I am concerned that the standards created in the new permit were not created in the existing rulemaking process. As I understand it, the rulemaking process provides for a transparent process and would give Washington Beef the opportunity to work directly with technical experts from the EPA and would also provide the community and customers the opportunity to participate in the process.

The EPA's proposed changes in applicable water quality standards look to be both unattainable and unnecessary, which puts Washington Beef and Washington state's economy at risk. The loss of this employer, a positive contributor to the community and a critical vendor supplying high quality beef to our business and the customers we serve would be devastating, leaving us with lower quality options and less choice.

I respectfully encourage you to reconsider the draft permit and instead, partner with Washington Beef to identify a workable solution for water quality standards that align with how the facility has historically been regulated. Taking these steps would continue to help our environment while also continuing to ensure that the company is able to supply our needs in the long term.

Thank you for your consideration of my comments on this matter.

Sincerely,

Cliff Rigsbee
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