

To: Commissioners, Port of Port Townsend
From: Tom and Barbara Ehrlichman
Date: July 10, 2024
Re: Short's Family Farm Plan and Proposed Resolution No. 822-2024

We reside on a small farm less than one mile north of the Short's Farm. We participated in the two public workshops held for the Farm Plan, concerned about air and water quality and the viability of farming in Center Valley. Late yesterday, Port staff posted the draft Plan online.

The work of the steering committee and Port staff in support of farm enterprise is commendable and we strongly support those efforts. However, we feel that an investment of some *additional time* and research in the Short Farm planning project is needed prior to adoption and will benefit the community, by ensuring that long-term impacts to Chimacum Creek and Center Valley are thoughtfully disclosed, analyzed and mitigated. Your agenda on July 10 proposes quick adoption of the draft Plan, without the benefit of environmental assessment and without a good opportunity for public comment.

Given the haste of the proposed adoption, we have taken a quick read of the Plan immediately upon its release late yesterday. We are writing to identify obvious areas that seem to us to be problematic and deserving of your attention prior to adoption. Thank you for considering the following five problem areas that we think warrant a Plan rewrite prior to adoption.

1. This "non-project" planning action needs environmental review. There is no mention of SEPA in your proposed resolution or in the Plan itself. SEPA review is supposed to take place at the earliest stage of a multi-phased action, when impacts can be identified and analyzed, as described below. As you know, Ports have the ability to conduct their own SEPA review before they ever get to the permitting stage. We urge you to follow that process prior to taking this "SEPA action;" the Plan and/or accompanying documents need to provide information to the public and to decisionmakers regarding the environmental impacts of the proposal.

Recommendation:

Please provide information on compliance with SEPA at the public meeting on July 10.

2. The first bullet point under *Strategy 1.1* in the Plan should be omitted, absent this further study. *Strategy 1.1* states: "Investigate, and if feasible, fund and construct the infrastructure needed to periodically host a mobile slaughter unit (MSU) at the Short's Family Farm." This policy directive to staff is premature at this time and unsupported by the Plan itself:

- The Plan makes this specific use more likely but does not disclose the many associated adverse air and water quality impacts that are likely to go with it.
- This strategy item does not identify any probable significant adverse environmental impacts and does not propose any mitigation of adverse impacts. There is nothing in the record that evaluates the waste disposal problems already documented for other mobile slaughter units in the state.
- A mobile slaughter house has a known range of probable significant adverse environmental impacts, based on well-publicized experiences in other state locations.

- Neither the draft Plan or the Port’s website offer any evaluation of possible site alternatives for this, with the capacity for appropriate waste disposal (areas with sewer).

Based on our review of what is in the draft Plan disclosed yesterday, the proposed action promotes a slaughter operation at this location prematurely, without supporting analysis. In our view, the Port must perform more analysis prior to any planning action favoring this location for this specialized use. The analysis should take into account the proximity of state shorelines.

Our neighboring cattle farmers deserve the community’s support; the Port’s efforts on their behalf should continue. However at this time, in our view, the Port should remove this first bullet point from *Strategy 1.1* until the water quality issues known in other cases are analyzed.

Recommendation: Analyze water quality impacts. Conduct a separate evaluation of other properties the Port could acquire or currently owns where this use can be sustained without aesthetic or water quality impacts to Center Valley and Chimacum Creek.

3. *Strategy 1.2* should be amended to delete reference to creating new vehicular access onto West Valley Road, until the generic and known impacts of that new use are analyzed, including the range of construction costs and the range of environmental impacts that could result to Chimacum and Naylor Creeks, local traffic and the local drainage system. Currently, the draft Plan only states that costs could exceed \$100,000.00, without any assessment of funding sources. The Plan does not even mention a purpose for a new road access in support of this directive to staff.

Recommendation: An explanation of the need for additional farm traffic on West Valley Road is needed, with general impact analysis, prior to setting this priority for use of public funds.

4. The draft Plan should be amended to include a section with policies identifying and addressing significant issues identified by the public during the two early workshops. At the public workshops, there were numerous environmental issues identified by the public, including noise, water quality, protection of critical areas, and visual and aesthetic impacts. This current draft of the Plan does not honor the public’s investment of time in the early planning stages because it fails to list and recognize the ideas and concerns expressed by attendees.

5. Flooding and groundwater contamination are major issues for management of the Short Farm, as identified in numerous prior public comments. The Plan should be amended to analyze those problems in depth, so that any offered solutions are well supported. Inexplicably for a plan proposing flood control action, flooding dynamics in the basin are not described and analyzed.

In summary, we appreciate the enthusiasm and ideas for the Short Farm described in the draft Plan. And we believe your ownership of the farm will help protect farmland in the Valley for future generations when thoughtfully planned and managed. The current version of the draft Plan, however, misses a key planning principle required for governmental action: known impacts must be disclosed at the earliest stage that they can be identified and analyzed.

The Port is well equipped to do this considered analysis. If for some reason this action is to proceed now, without the environmental analysis, we urge you first to omit the choices promoting a mobile slaughter unit and West Valley Road access construction, until the missing impact analysis is completed. In closing, we urge you to allow more time for public and agency comment on whether the Plan addresses the key issues raised during earlier public meetings.

Thank you for considering these comments.