



January 24, 2020

Emily Kijowski
Washington Department of Ecology
Solid Waste Management
P.O. Box 4760, Olympia, WA 98504-7600
emily.kijowski@ecy.wa.gov

Re: Biosolids General Permit

Dear Ms. Kijowski:

PCC Community Markets, a locally-owned community food market, appreciates the department's request for input on the issue of whether a statewide general permit is appropriate for biosolids regulation. We respectfully submit that it is not.

As the nation's largest co-op grocery retailer with 13 stores and more than \$288 million in revenue, PCC Community Markets has dedicated our triple bottom line business to providing local, organic and sustainable food to Washington state residents. Our shoppers care about the environment and how their food is grown, raised, and harvested. Our shoppers also care about what can be done to reduce the harmful impacts of our food system.

Application of biosolids to agricultural lands, unfortunately, presents significant risks to both aquatic and land-based ecosystems through introduction of potential toxins and potential pathogens. Overall, we do not believe that biosolids application to agricultural lands should continue or be permitted—especially with the increasingly fragile state of our local environment and species, such as Chinook salmon.

However, should the department continue its permitting program for biosolids, we believe that it should be under a program offering more individualized assessments of whether the application of biosolids can occur without negative impacts to the many at-risk ecosystems and species. We also believe that a move to individual permits would ensure greater accountability and transparency should these risks not be properly assessed or violations of the permit occur.

Again, we thank you for the opportunity to comment.

Sincerely,

Aimee Simpson
Director of Advocacy & Product Sustainability