

# Draft CAFO Permit

Heather Bartlett

Water Quality Program Manager



# 2014 Development Process

Meetings with interested parties

Three main buckets:

- Nutrient Management Plan process
- Groundwater protection,
- Reactive vs. proactive permit.

Preliminary draft



# 2015 Development Process

Continued meeting with interested parties

Reviewed and considered comments on preliminary draft

Changes based on what we heard:

- Account for East/West side differences
- Build-in flexibility
- No requirement for lagoons to be lined
- No requirement for groundwater monitoring



# Compatibility

Build-in compatibility with existing regulatory framework (RCW 90.64)

Ongoing coordination with WSDA



# Public Comment

Comment period: June 15 to  
August 15

Extended to August 31 due to  
technical problems



# Comment Stats

<b>Total Comments:</b>	<b>4,565</b>
Total Unique Comments:	269
Total Form Letters:	4,296

Link to Comments

<https://data.wa.gov/Natural-Resources-Environment/2016-Draft-CAFO-Permit-Public-Comments/a9ns-58n5>



# Comment Themes

## Environmental concerns:

- One permit, not two
- Groundwater monitoring
- Lining lagoons
- Environmental justice
- Cost to community
- All medium and large CAFOs should be covered by permit
- Implementation and enforcement



# Comment Themes

## Industry concerns:

- Buffers
- Validity of economic impact analysis
- Soil and manure sampling regime
- Land application restrictions
- Adaptive management actions
- Costs and business viability



# Buffers

Concerns about buffers:

- Aren't protective enough
- Take too much area out of production
- Aren't flexible enough for different conditions



# Economic Analysis

Concerns about analysis:

- buffer areas insufficiently accounted for
- Assumed CAFOs only had one lagoon when multiple lagoons are common



# Next Steps

Complete review of comments

Identify and incorporate appropriate and necessary changes

Complete response to all comments in a Response to Comments (RTC) document



# Next Steps

RTC will be made available when the final permit is issued

Still on track to issue the CAFO permit by the end of 2016





# Questions?

CAFO Website:

<http://www.ecy.wa.gov/programs/wq/permits/cafo/index.html>