DEPARTMENT OF ECOLOGY
OCT 0 2 2015
WATER QUALITY PROGRAM

[Recipient Name]
Jonathan Jennings
WA State Dept. of Ecology
Olympia, WA

Dear Jonathon Jennings,

I am writing to voice my concern about the new CAFO proposal. We have several concerns with the idea:

1. The reason we have an earthen lagoon in the 1st place was because the DOE made us put it in years ago. We were opposed to the idea, but went to and through the NRCS and had our lagoon engineered up to the standards required. Now all of a sudden the lagoon, that we were forced to build in the 1st place, is our problem that is doesn't meet requirements. Is it too hard to understand then that we are not fans of ideas that come out of these government agencies? Is it possible that because they brought this idea upon us and now it turns out that they changed their mind and they think this is now a problem idea that we could sue them for the cost of making these lagoons meet their new possibly better standards (or not)?????

2. Many of these suggestions are already being done. Is there going to be both the DOE and the WSDA coming around enforcing these?

3. We think it is impractical to expect soil testing and manure testing to be done before each application of manure. Why is it necessary if the end result of the fall soil tests show that we used up all the nutrients? And then for us to go 3 feet which is hardly even possible tells me the amount of knowledge you guys have to come to the table with. While we are doing that other crops that use infinitely more fertilizer don't even have to do a fall nutrient test. Come on!! The method we are using now already hurts our crop production because we under apply nutrients to make sure that our crop uses it all up which makes the crop produce less which means we cannot apply as much the next time which leads to a downward spiral in crop production. Are we talking about fecal coliform or nitrates? If nitrates are the perceived problem are any other agricultural crops expected to do a fall nitrate soil test?

4. Who is actually getting sick from the problems they claim are out there? They somehow have come up with water quality standards that are more strict than any other state and then we have to abide by them when no one is getting sick.

5. If it is about the fish not being in the rivers I feel it has more to do with the way the fisheries are managed. We live by the Canadian border and a lot of the local sportsmen go up to Canada to the Fraser river system for good fishing. The reason there are more fish in the Fraser is because the Natives have to attend their net for as long as it is in the river. They are not allowed to leave them in the river unless they are by their nets. Also, they dredge the Veddar river and create places for the fish to spawn. On the way to go fishing up there I have seen some manure handling techniques that we are not allowed to do but yet they have a better fishery than we do?

6. Ever since I have become a WID commissioner, I have been following the water sampling that Whatcom county has been doing and for the most part the sampling doesn't support that the problems are from dairy. There are areas where there are no dairy farms and the fecal count is too high. Other times all the samples are too high because of a different time of the year. The more I study the results the more I scratch my head as to how they make sense. I think before there are expensive measures done to fix a problem that we are not sure about there needs to be more proof that the problem comes from dairies. Again, who is getting sick?

7. Sometimes I think that the people making up these rules need to understand how tough life is on the dairy farm. We are not a bureaucracy that can afford all kinds of people on staff to do all these additional testing projects etc. It just isn't that lucrative on a dairy farm and we actually have to operate in the black. We are not allowed to exceed our budgets and operate year after year in the red like government agencies. So, with all these new requirements, I believe it will be the end of a lot of dairies including ours. It also will lead to the small dairies not being able to afford to put all these rules in to practice and then only the largest farms will survive which will concentrate the animals in smaller areas which will add to the problem.

8. On the part about keeping animals 35 feet from the ditch, we go fishing to Rufus Woods lake and we boat 30 miles through the Indian reservation and the very natives who are supposed to be so concerned about water quality have their beef cow herd drinking out of the Columbia river!! The cows were actually standing, up to their waist, in the river drinking. And now we have to keep our cows 35 feet away from a ditch that is dry most of the time cattle are out on pasture anyway. How would that double standard make you feel? Also, you take 1 ruling by a liberal judge who decides to throw out all the knowledge of federal engineers, the EPA, the DOE and all the people who really know what they are talking about, and use that decision as an excuse to make up all kinds of other rules like the buffers and soil testing which have nothing to do with what the judge ruled about lagoons in the 1st place. What does us keeping track of our mortalities have to do with the judge's ruling on lagoons?

9. We pay taxes on this land and now if we keep these huge buffers it becomes worthless because we can't put the nutrients on the ground to make it grow. We are expected to pay taxes on that land and now we can't use it for production. It seems that those who know the least about farming and don't have the privilege of being stewards of the land want to try and tell us how to do our job when they themselves wouldn't be able to survive for a year operating our farms. We cannot do this financially it will put us out of business.

10. I have been to 3rd world countries multiple times on mission trips and have seen the priorities of people who have no money and no food and I realized that the problems we face are because we have such a lucrative society that people can get all fussy about what they eat and have the resources to demand perfection in water quality to the point that business can't survive it and then we lose our position of well being and when it gets so bad that we don't have expendable income then the environment begins to suffer and people are letting sewage run down the street if they have a bathroom at all. Why don't we be satisfied with the level of where we are at and turn our focus to bringing up the rest of the world to our mostly perfect standards. I realize that would mean that the

huge DOE would have to actually go out and get a real job then instead of surviving on the backs of working people.

11. When we live on the wet side of Washington state with the heavy rainfalls at time we become concerned about our storage lagoons holding enough to make it through the winter. (surprising to the DOE and environmentalist groups because they are convinced that it all runs out the bottom) We end up watching the lagoon daily not weekly to make sure that we are going to store enough until we can apply. We worry about the inches of storage and then we see on the Seattle news that The waste treatment plant in Seattle couldn't manage the heavy rainfall so they had to release 6 MILLION gallons of waste directly into the sound. We are not allowed to release a drop of wastewater already. We far exceed the standards of other agencies and municipalities but we are often too busy working to defend ourselves. This type of activity has to be done in addition to what we already do. Instead of on the case of the DOE getting paid by us and then having all the time and resources to spend attacking our industry.

12. I don't know if you are aware of how tight financially the dairy industry is but we have lost so many dairies because they couldn't survive financially so I am also opposed to having the new cost of the permit because I think that will also be a new unnecessary burden. If the environmental groups are so sure that we are causing a problem why don't you find a way for them to pay for your permitting program.

13. The DOE can't handle it that they have not had jurisdiction over dairy farms because the WSDA had the dairy program and their thinking is that you can't trust agriculture to inspect agriculture. We have been on the other end of these WSDA inspections and they totally do a trustworthy job of inspecting our farms.

14. Just this past Friday we had a forecast of a 1/2" of rain that turned out to only be a 1/4' of rain. Do you know in a Western Washington springtime how many times there is 1 day after a rain and no 1/2" of rain forecast for 3 more days? How could that work for nutrient applications before spring crops especially for the custom applicators?

15. Another government program that has caused problems with water quality is the CREP project which encourages all wildlife to gather around our streams and ditches. Another reason we question government involvement in our business.

16. WE Farmers cannot set the price of our milk and pass the cost like city and municipality.

These Huge offenders with money are forgiven and dairy farmers are targeted and find.

This is UNFAIR and proves you target our industry.

17. These regulations that cost up to $500,000 will increase the price of food and force us to import food from countries with little or no regulations. This puts us unfair completion.

18. Many of the small farmers will be forces out----REALLY is that what you want. Peoples love their local famers.

19. Everyone claims they want to SAVE farm land. How is this going to impact land. If you cannot farm it you will be forced to put in houses.

20. 20 years ago we expanded our lagoon. We probbed 12 inches and tested for nitrates and seepage.

Results—ZERO nitrates, ZERO seepage under lagoon.

Please listen to us. We need you to help us and treat us fairly.

3rd Generation Dairy Farmer

Roger Bajema

792 East Badger Road

Lynden WA 98264

Thank you