

SEP 14 2015

WATER QUALITY PROGRAM

Washington Department of Ecology  
c/o Jon Jennings  
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Sept. 11, 2015

Dear Mr Jennings

This is regard to the new manure management regulations that are under consideration.

To introduce myself, we are a 3 generation, going on the 4<sup>th</sup> generation Organic Dairy farm on the Enumclaw Plateau. We are milking 200 cows, and have replacement animals as well. We farm 200 acres. We have sold our Development Rights to King County, so the development of these lands is not possible.

First off I want to say if these new regulations were put into effect today, we will be out of business. As you probably know dairying is a low profit margin enterprise. These added expenses will break the camel's back. These regulations will also make our land's value become meaningless, as no one will farm under these circumstances, we cannot develop the lands because of the Development issue. So what do we do? We loose equity and we can't farm. This becomes a taking by government by default.

Our top soil is relatively shallow loam, it is on mud flow from Mount Rainer. The underlying soil is impermeable, and does not lend itself to septic systems.

Lagoon were mandated by Ecology, promoted by our Universities, were built to NRCS specifications, we soil test once a year, test our manure, and spread manure according to agronomic specifications. We test our well water, which always passes. To arbitrarily say that all lagoons leak without facts, is wrong. Even if JUST one test was requested to disprove a problem before other demands were made would be more acceptable.

Rather than impose all these new regulations, test the neighbor's wells, to see if there is a problem. If there is then we fix the problem or go out of business. Most of our neighbors are on City Water from Enumclaw.

How do you describe a field? As rotational grazers we have 31 fields on 80 acres. Now is this one field or 31 fields? This is all on one side of the road, the other side of the road has 11 paddocks on 50 acres. 11 paddocks or one field? On another section there is 1 field of 34 acres. Add up the cost of testing all of these parcels to 3 feet 2 times a year. Or are you requesting that we only test the field(s) that has the lagoon?

Fortunately we are not bordering a river or a stream, but one parcel that we farm, has been considered a wet land, this can no longer be farmed? King County allows this. You take these 20 acres out of production, it makes dairy farming organically even less viable. We are already loosing land that we have rented, to property sales. Lands that did not have their development rights sold. You add all these new regulations, there costs, and you can see how our smaller farm and farming in general becomes less viable.

I feel that we are an asset to the eating public, that if milk is not produced locally, our customers also loose in not having a local source of milk.

Sincerely  
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