

From: [Jon DeJong](#)
To: [Jennings, Jonathan \(ECY\)](#)
Subject: CAFO comments
Date: Thursday, October 01, 2015 11:57:00 AM
Attachments: [jennings..docx](#)

10/1/15

To : Jonathan Jennings,

I am writing this comment concerning the proposed new CAFO permit as written. I am a 3rd generation dairyman and farmer here in Whatcom County. Our family has farmed at our location for 65 years and hope to continue dairying here in the county for the next generation . Our farm involves four families that depend on productive cows, healthy ground, and a strong community to support our industry. My very real concern is that the proposed permit requirements would create another layer of regulations that would hinder the ability for dairies to operate in this area.

In order to sustain a dairy industry, we must be able to compete in national and international markets. To stay competitive we cannot operate under undue relations that pile on costs that other areas do not incur. As written, this permit would do just that. The smaller "family" operations that the public seeks, would be most affected, to the point of many closing down.

A number of items are big deals that are seen as regulations, not solutions. These include buffers that take away productive land, manure applications based on unreliable weather forecasting, soil sampling that is not logistically feasible, lagoon specs aimed at an unproven problem, and a burden of another agency to provide records to. All these intend to provide environmental benefit, but miss the objective because they are not based on proven science or firsthand knowledge and experience the local people involved have.

Our industry is already regulated very heavily. Most requirement are conducive to protecting public health, employee safety, and environmental health. These are justified and valued. The difference with the propose permit requirements is that they don't provide solutions to the environmental issues at hand. ***If these this permit goes forward as written, there will be negative consequences to the dairy industry and community, but likely not an improvement to the environment. When asked what happened to Whatcom's dairy industry, the role of the DOE will be a big factor. If the role is to protect the environment, please consider the comments from the industry involved. If the goal is to protect the agency from a few noisy people that don't like animal agriculture, your permit is on the right track.*** The dairy industry is an easy target, but regulating us out of business will not solve water issues. We have been the lead on nutrient management through our current regulations. Please consider that over regulating one group does not solve other sources of pollution.

Thanks for your willingness to hear the concerns that we have. We all would like a solution.

Jon DeJong

Eaglemill Farms, L.L.C.