

**From:** [Joshua Monaghan](#)  
**To:** [Jennings, Jonathan \(ECY\)](#)  
**Cc:** [Erin Ericson](#)  
**Subject:** CAFO general permit changes comments  
**Date:** Friday, October 02, 2015 8:53:33 PM  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)

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Dear Jonathan,

We are writing to share some initial input on your draft changes for the CAFO general permit updates. Thank you for inviting comments.

The King Conservation District (KCD) works with 29 dairies in King County, providing technical assistance on farm nutrient management. We also value very productive collaborations with Ecology in work addressing water quality and habitat improvements within our District. KCD staff are in the process of collecting information to understand the implications of the draft CAFO permit on our work and our cooperating producers. We have done an initial read through of your materials, have consulted with other Conservation District dairy specialists, and have read pieces from dairy industry groups and the Capital Press. In the process, we are receiving some mixed information/ related questions. Our first question at this time is whether Ecology's CAFO general permit updates will result in requiring all dairies with earthen manure lagoons to obtain a CAFO permit? or are these updates intended for dairy producers who are already designated CAFOs? If the changes will require all dairies with earthen lagoons to become CAFOs, we are concerned about the significance of the impact on the producers and the dairy industry.

The Capital Press article, dated October 1, 2015, states, "DOE plans to extend the (water pollution) protection to groundwater and has tentatively proposed that any producer with an unlined manure lagoon obtain a CAFO permit." This article indicates that these updates will require all dairies with earthen lagoons to be classified as CAFOs.

While some dairies might be a good fit for manure lagoon liner retrofits, especially in situations where there is a high risk of impact to ground water, KCD staff recognize that these retrofits will be very expensive to the industry and the public; with that in mind, we recognize that such retrofits should be prioritized based on criteria including relative potential to address identified ground water resource concerns. Our experience is that targeted natural resource assessments, cost share funding and voluntary cooperation can be great tools in helping the dairy industry making these kinds of changes.

Our concern is that if these proposed general permit changes create a statewide CAFO permit requirement for all dairies with earthen lagoons, the impact will be adding heavy new regulatory requirements to hundreds of dairies (associated with the CAFO permit) without bringing significant improvements to targeted ground water concerns.

KCD is strongly interested in working with Ecology to better understand the implications of the draft CAFO permit and to explore effective paths to work with the industry and producers to both address ground water concerns and to ensure an economically sustainable dairy industry. We look

forward to learning more about your proposed changes and providing ongoing input on your proposed work.

Sincerely,

Josh Monaghan and Erin Ericson  
Dairy Planning Team  
King Conservation District

## **Joshua Monaghan**

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