

**From:** [Ross and LeAnna McMahan](#)  
**To:** [Jennings, Jonathan \(ECY\)](#)  
**Cc:** [1 Joel McMahan](#); [2 Wade McMahan](#); [4 Karrie McMahan](#); [5 Lindsay McMahan](#); [Bill & Laura](#); [Carrie McMahan](#); [McMahan Family](#); [wsdf@msn.com](mailto:w sdf@msn.com)  
**Subject:** CAFO Comments  
**Date:** Friday, September 18, 2015 12:23:03 PM  
**Attachments:** [Comments 2015.docx](#)

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Attached find comments from Cowlitz Meadows Dairy, Inc.

Ross & LeAnna J. McMahan  
166 St Rt 131  
Randle WA 98377  
360-497-3521

September 17, 2015

Cowlitz Meadows Dairy, Inc  
158 State Route 131  
Randle WA 98377

Washington Department of Ecolog  
c/o Jon Jenninng  
PO Box 476  
Olympia, WA 98504-7696

Comments for Draft CAFO permit:

- 1) Your definition of lagoon appears to cover concrete pits, is that true?
- 2) The proposal would eliminate 20 to 30% of our land from current usage. Our experience is the productivity of unfertilized ground continues to diminish and is 25%. We are an organic farm so animal manure is our option. The cost of alternative amenities may be prohibitive or not available. The value of replacing our organic forage has been \$350/ton, for a total of \$140,000/yr.
- 3) It is difficult to determine sampling costs. We need to know the definition of a field? Does portable electric fencing define a field or is it crop and management differences? Is spring and fall sufficient or is every application and how close of time frame to an application? We estimate our cost from a minimum of \$4,000/yr to \$60,000/yr. Our other huge concern is actually being able to accomplish the work of amenity application, when our time is taken up sampling and I assume waiting for results.
- 4) We have spent 40hrs trying to understand this draft proposal and make our comments. We have identified \$200,000/yr of additional cost, i.e.; more than 20% of our gross income. That does not include the management hours of implementing.
- 5) Our conclusion upon completing this exercise is that perhaps we should discontinue the business.

Sincerely,

Cowlitz Meadows Dairy, Inc.  
Ross M. McMahan, President