

**From:** [rdo](#)  
**To:** [Jennings, Jonathan \(ECY\)](#)  
**Subject:** cafo permit  
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dear sir.

I am deeply troubled by the draft that has been issued that all dairy lagoons be lined and taht if they leak will need a cafo permit because they are dicharging. our lagoons we designed by the soil conservation service in accordance ewith there standards I do not believe that our lagoons are leaking. I am a small producer and to line these lagoons would be very cost prohibative for me. I do not understand that if I am doing my best to be a good steward why I should need to meet standards that are cost phrohibative for me. there are many different soil types in the valley and many different construction sites. I believe it should be done on a case to case bases rather than this be the standard that they all leak.

as far as spreading manure keeping it 100 feet away from a water way ditch or canal is crazy. I do not mind a little buffer that keeps it out of the water and keeps the banks in good condition but 100 feet on both sides of a ditch or water way this would cut roughly 1/3 of our crop land out of production. To put this into perspective on a 160 acre piece of ground that is 52 acres that could gross us \$31,200 in revenue. in stead it would cost us \$15,600 per year to pay the fixed cost on the land and not be a ble to farm or do much with this ground. Why in the world would I want to pay \$15,600 for land that I can do nothing with. and this number is a yearly number because we own land that this proposal could effect. The ditches and canals that I refer to our irrigation canals and deliveries that deliver us water during the growing season. There are very few wetlands in Eastern Washington.

if we are not allowed to spread manure what are we to do it. when applied correctly it is a wonderful fertilizer. it contains nitrogen, potassium, phosphurus, along with elementals such as sulfur boron ect. if I did not have this I hould need to buy the fertilizer for the crops. purchased fertilizer can run upwards o f\$300 per acre a year to grow a crop. that number is cost prohibative with the decling commodity prices. ie( we grow 4 ton corn here soil not so good our fixed costs are \$300 per acre and 300 for fertilizer that is purchased with \$150 corn you see that  $150 * 4 = \$600$  we barley cover the cost with purchased fertilizer). there is not profit for us. With a manure application and crop rotation you do not need to apply manure to the same field every year. it could be every other year. soil sampling down 3 feet to me seems rediculuce I want all of those nutrients to stay in the top 8 inches of soil. the majority of the crops we gow the root zone does not go down past that 8 inch level and the plant will not pick up any nutrients from the 3 foot level.

I am sure you intentions are good as mine are but bear in mind if we have taken the care to not pollute, contaminate, why are these regulations being imposed on us. I cannot afford to line a lagoon. or comply with these regulations. This should not be a one size fits all issue, it should be done on a case to case basis. the are many good stewards our there to be affected by something they did not do or unknowlingy did and you implementation of these rules will cost them their livelyhood.

as for me it will be the end as i cannot justify the cost with 100 cows or 500 cows. I am not a large operation nor do I have the cash flow to make the needed improvements to comply.

Aaron W. Olson



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