

From: [MSCHONEVELD](#)
To: [Jennings, Jonathan \(ECY\)](#)
Subject: CAFO Comments
Date: Thursday, October 01, 2015 11:39:57 AM

Dear Jonathan Jennings

I am writing to voice my concerns regarding this new CAFO proposal. Below are my concerns:

1. I've been in dairy business in WA state now for 19 years and have followed the nutrient management act rules to a tee. I have NOT had any discharge or compliance issues during these 19 years. So then why would I need to get a permit and follow a whole new set of rules created by your agency? This sounds like be punished for something I have not done.
2. Who came up with the idea of 35 to 100ft buffers? In Western Washington, we farm many fields less than 10 acres. These buffers will make these fields unfarmable and thus lead to more nutrients being applied to other fields. This rule is counter productive. Our current buffers in our nutrient plan are smart and workable. Larger buffers in the winter during the rainy season and small buffers in the late spring thru early fall during the dry season. We have science to back this up. Check out the summer stream sampling program in our area. Bacteria counts were relatively low in dairy farm areas this past summer and high in residential areas and the Canadian border. Please use science when you come up with ideas such as this.
3. Years ago your Dept. of Ecology told dairies we needed to build lagoons to store nutrients for the winter months. So we used NRCS to build those lagoons to standards that were acceptable to your Dept. back then. Now you want to change the rules after are farms are built and constructed around those rules. Its like moving the goal posts in the middle of the game! Again you have no science to back up your ideas on requiring engineering and monitoring of lagoons and the fact that if a farmer has a lagoon he would need to be under permit. So what's next? In 5 years you can just change all the rules again? How can any farmer own and run a farm when the Dept. of Ecology can step in at any given time and call previous guidelines inadequate?
4. If the Dept of Ecology is so concerned about nutrient leakage, then why not look to what actually is leaking. Septic systems are designed to leak. Every septic system has a drain field. Are you going to start checking engineering and monitor the 65 septic systems just north of my farm?
5. Over the years, I have had the Dept of Ecology, WSDA, and EPA inspect my farm several times. I've had fly overs. I have many inspections. I've worked with all 3 **Agencies** and excepted suggestions and improved anything that could be improved from those suggestions. I ask that you leave in place the nutrient management act we are currently following and the WSDA is holding us accountable too. I fear that if

these new non-science based rules you are proposing are put in place, many farmers will exit the dairy business. When I moved to Whatcom County 19 years ago, there were 255 dairy farms in production. Today there are less than 100. If your CAFO proposal is put in place, these new rules will cause many more famers to exit and farm related business to follow. I am a 4th generation dairy farmer. I want my children to farm in the years ahead in Washington State.

Michael Schoneveld
Ferndale, WA