

From: [Hal and Robyn Meenach](#)
To: [Jennings, Jonathan \(ECY\)](#)
Cc: [Billig, Andy](#); [McCaslin, Bob](#); [Dansel, Brian](#); [Holy, Jeff](#); [Schmick, Joe](#); [Kretz, Joel](#); [Parker, Kevin](#); [Riccelli, Marcus](#); [Schoesler, Mark](#); [Dye, Mary](#); [Shea, Matt](#); [Baumgartner, Michael](#); [Padden, Mike](#); [Short, Shelly](#); [Ormsby, Timm](#); [Davis, Tom](#)
Subject: comments prelim. draft CAFO permit
Date: Friday, September 25, 2015 10:23:29 AM

Washington Department of Ecology
Director Maia Bellon
c/o Jon Jennings jonathan.jennings@ecy.wa.gov
PO. Box 47600
Olympia, WA 98504-47600

September 25, 2015

Re: Comments on Ecology's Preliminary CAFO NPDES Permit Draft

Dear Director Bellon:

Spokane County Farm Bureau appreciates this opportunity to comment on Ecology's preliminary draft CAFO permit proposal. These comments are designed to make the proposed permit more workable for producers.

We are very concerned that the proposed permit, as currently drafted, will create unnecessary duplication of existing WSDA nutrient management efforts and put a large number of dairy farms out of business. Dairy is a huge part of the economy of Washington. There is more than a billion dollars of farmgate value in fluid milk alone, yet alone beef sales. The related feed, transportation, processing, and distribution activities fuel much of the economic activity in several of our counties. Producers need resources to remain economically viable, support their families, and continue to contribute to the state economy. At the same time, the public should not be forced to sacrifice a local supply of milk in favor of a nebulous assumption that water will be cleaner. We can and must work together to do better.

Based on the information available to us at this time, we are deeply concerned that the department's proposal will impose new permits on hundreds of dairies statewide. We are concerned that this will compel unreasonably expensive investments in lagoon liners and other engineered projects without demonstrable environmental benefits.

While we support Ecology's primary objective of protecting the quality of Washington's waters, we believe the department must take the time necessary

to develop a permit that is based on credible science and not be overly burdensome for producers. It is not at all clear how the department intends to ensure that dairies and other affected livestock operations will be protected from over-regulation, consistent with the legislature's intent for RCW 90.48.450.

*"The legislature finds that agricultural land is essential to providing citizens with food and fiber and to insuring aesthetic values through the preservation of open spaces in our state. The legislature further finds that government regulations can cause agricultural land to be converted to nonagricultural uses. **The legislature intends that agricultural activity consistent with good practices be protected from government over-regulation.**"*

We are also concerned about producer viability impacts related to proposed standards, buffers, soil testing requirements, and paperwork burdens in the preliminary permit proposal. Please refer to Washington Farm Bureau comments for our collective thoughts on these concerns.

For the reasons expressed above, we request an additional 60-day extension of time for more detailed discussion of the current preliminary draft proposal. We also request a 60-day public comment period, and a hearing, on a revised draft once it is released. Before a permit is adopted, we also ask that Ecology first complete an economic analysis to ensure that permit benefits will exceed permit costs, a least burdensome alternative assessment, and a small business impact analysis.

This will provide affected producers with the information they need, as well as public notice and a fair opportunity to comment. Affected operations need to be able to participate meaningfully in the development of policies that affect their livelihoods.

Thank you for this opportunity to comment on Ecology's proposed preliminary CAFO permit.

Sincerely,

Hal Meenach, President

Spokane County Farm Bureau

Cc: Andy Billig, Marcus Riccelli, Timm Ormsby, Bob McCaslin, Matt Shea, Mike Padden

Michael Baumgartner, Jeff Holy, Kevin Parker, Shelly Short, Joel Kretz, Brian Dansel

Joe Schmick, Mary Dye, Mark Schoessler, Tom Davis



This email has been checked for viruses by Avast antivirus software.

www.avast.com