

From: [TwinBrook Creamery](#)
To: [Jennings, Jonathan \(ECY\)](#)
Cc: WSDF@msn.com
Subject: CAFO Draft Permit comments
Date: Thursday, October 01, 2015 5:57:31 PM

October 1, 2015

To: Jon Jennings, Dept. of Ecology

I have some comments on your draft CAFO permit.

1. Big dumb buffers. These are proposed with no science behind them as to whether this is effective. Buffers need to be managed on an individual basis not a one size fits all. Slope, crop, annual rainfall are just a few things that can influence buffer size requirements. On my farm, I have numerous drainage ditches around fields and if a 100 ft. buffer were mandated approximately 25% of my farm land would not be productive.
2. Your claim on lagoon seepage or leakage. You are making the assumption that all do. Is that not contrary to what our country is all about? Innocent until proven guilty. Your model is all are guilty and none are innocent. Seems as though you know something we don't. Even if some have downward seepage is that not the way all septic systems work, downward seepage purifies the water.
3. Why did the dairy/cattle industry start using manure storage lagoons? Was it to not apply nutrients to the ground at inappropriate times of the year? Now the very tool you told us to use to eliminate potential pollution is used against us. Seems a pretty much no win situation for us.
4. My biggest observation of this draft permit is it is just another tax to feed an agency that is already grossly overstaffed and highly unproductive to society, with no solution to a perceived problem. If this draft in its present form were ever implemented we would quit dairy farming. We perceive this is the message you are trying to send out to the dairy industry, not by words, but by actions alone. It is the way our local office of ecology works and it probably is a top down driven policy. Actions allow us to not think otherwise.

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