

From: [Joan Vande Hoef](#)  
To: [Jennings, Jonathan \(ECY\)](#)  
Subject: CAFO Comments  
Date: Thursday, October 01, 2015 6:01:17 PM

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Jonathan Jennings  
WA State Dept. of Ecology  
Olympia, WA

Dear Mr. Jonathan Jennings,

We in the dairy industry have always been concerned about the land, water, and environment. We feel that it is a resource that we have been given to be stewards over. Not to use and abuse it for ourselves, but to protect for the next generation. We have been in business since 1977. Before that I farmed with my Dad who started farming in 1967. Now as we look to the future our three boys hope to continue farming on the same land. Throughout the years the Conservation district has been helping my family and I in our mission as stewards.

We have made great improvements in storing and applying nutrients from 1967 to now. The NRC has helped us with planning our lagoons and underground piping network. This has helped us to more efficiently move and apply our nutrients at the right time and place. Also the NRC has educated us on our soils and crop needs. They have helped us learn how different soils and crops use the nutrients we apply.

Before this education we just guessed at what we needed to apply. We knew that if we put too much on it kills crops. If we put too little on we lost the opportunity for a nutrient rich healthy crop. Now with meters on applicator pumps, soil testing, and nutrient testing we can fully use our knowledge. We can put the best amount of nutrients on our land for a

healthy crop and healthy soil.

We know how many cows we have, so we can figure out how much manure they will provide us with. With this information we can plan on how many acres we need to properly use our stored nutrients. With larger and permanent buffers around water ditches and areas our plans are greatly hindered. Less land for our nutrients means less feed for our animals. This would make a huge impact on our financial situation. It would force us to buy more land at higher prices. This may work for some but the majority of family farms could not take on this financial burden.

We have filled in two lagoons over the years. We have found that it takes many years of work to drain and produce crops on this land. It is so well sealed that rain water stays on top of the soil and does not drain. It takes 3 to 5 years before the soil starts to perform again. We would like to see more testing on the leaking lagoon theory. This needs more study before the financial burden of installing lagoon liners.

Our hope is that our NRC and the Dairy Nutrient Management plans would be enough to help with what we need. That the burden of more regulation wouldn't make more dairymen exit the business. More education would be more profitable for everybody and less of a financial burden.

We know accidents happen we are not perfect. If they do we could work with the NRC and fix the problem. If there are damages to the environment we could work together to compensate for it.

Thanks for letting us respond to these CAFO proposals. We hope

you do not change them because they will burden our family  
farms more than you think.

Rodney Vande Hoef  
2121 Stickney Is. Rd.  
Everson WA 98247

October 1, 2015

Dear Director Bellon:

The permit writers of the CAFO discharge permit and regulations told our farmers at a meeting on August 25 that to comply with federal and state laws they must require a discharge permit of all farmers with manure lagoons. They referenced the EPA regulations regarding CAFOs and also state law regarding industrial and commercial waste and discharge.

We farmers believe that your permit writers need to go back and check these laws. EPA defines a Concentrated Animal Feeding Operation as one where animals are confined AND there is proven significant pollution. Without that pollution these are AFOs and do not require a permit. Your permit writer stated that they know lagoons pollute but when asked for proof admitted there was none but that the testing required in the new permit would prove it for them.

This is so outrageous, so un-American, such bureaucratic nonsense that we hardly know what to say.

The use of state law is also false. Farms hardly fall under the intent of the law as industrial and commercial operations and manure is a valuable product, not a waste product. We understand the state law also requires discharge to be pollution. We can clearly demonstrate that lagoons may discharge a small amount but that discharge does not represent pollution into ground water. So where is the basis in law?

In fact, state law prohibits any state agency to take action that results in the conversion of farmland to non-farm uses. It seems pretty clear to us farmers that your permit writers are on the wrong side of the law all the way on this issue.

Sincerely,

Rodney Vandettoef

Rodney Vandettoef

2121 Stickney Is. Rd. Everson