

**From:** [Jim Werkhoven](#)  
**To:** [Jennings, Jonathan \(ECY\)](#)  
**Subject:** CAFO Draft comments.  
**Date:** Sunday, September 27, 2015 8:16:48 PM

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Dear Sir,

My name is Jim Werkhoven and I am writing on behalf of my family's farm. Werkhoven Dairy is now 56 years old and entering into its third generation. The five Werkhoven families that own and operate Werkhoven Dairy have always tried to be good stewards of the land. We believe in the value of clean, safe water and that we need to leave this planet in better shape than what we found it in. Our dairy has been recognized regionally and nationally for its work in the environmental arena. This includes recognition from the Department of Ecology for our contribution to clean water in the Snohomish River Watershed in 2000 and in 2012 we were nominated and won the Outstanding Dairy Farm Sustainability Award from the Innovation Center for U.S. Dairy.

We are very concerned with the proposed CAFO permit. The permit as written will needlessly decimate the dairy industry in Washington State with virtually no benefit to the environment. The proposed setbacks would reduce our usable acreage by over 200 acres. This is a very conservative estimate. As a point of reference Qualco Energy ( we are partners) bought 77 acres in our valley for \$750,000 8 months ago. About 20 percent of which will be unusable for its intended propose. The proposal will needlessly destroy many farms including our own farm's Nutrient Management Plan. It will lead to to concentrating nutrients to fewer acres. The permit's " one size fits all" approach falls to take into account soil type, the slope of the land, the method of application, the rate of application and if the manure has been processed(digester). It does not recognize the benefit of manure digesters 99.9% pathogen kill - coliform/salmonella. Or that digested manure functions just like commercial fertilizer in that the nutrients are readily available to the plant greatly reducing the chance of any run off. This draft is terrible and I ask that it be rewritten. The cost to our family farm will be north of the \$1,000,000 mark. The Department's moving away from NRCS standards will put the Washington Dairy Industry at a disadvantage to almost every other region in the United States. This puts our family farm in peril. Thank you for you consideration.

Best regards,  
Jim Werkhoven