



Washington State Dairy Federation
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To: Helen Bresler, Department of Ecology,
Water Quality Program,
PO Box 47600,
Olympia, WA 98504-7600
Email: HBRE461@ecy.wa.gov

From: Jay Gordon, Exec. Director

Re: Draft Water Quality Trading Framework

Dear Helen,

Thank you for the opportunity to comment on the Draft Water Quality Trading Framework outline. I preface these comments with a statement that this trading concept is so new we are still trying to understand how these trades will work on the ground, so the following thoughts are more general rather than specific.

In studying these trading programs we see a strong potential to achieve very positive changes. The first thing that jumps to mind is a need to provide both the buyers and the seller ability and flexibility to be creative and experimental in reducing the cost while increasing the ability to reduce loading. We suggest a policy from your shop of encouraging pilot scale innovation efforts to refine a trading program. We all can learn and see which ideas, if piloted, will work via a trading program and which fall short.

Let me give an example; Dairy producers work on the non point-side of the world; both permitted and non-permitted dairy farms are expected to have no discharges from their operations. That being said we see efforts in the Chesapeake to advance and encourage nitrogen and phosphorous reduction technology being driven by funding from point sources as a win-win-win scenario. Obviously there needs to be certification in the trades and verifiable reductions in the ecosystem loads of these nutrients. Yet, there is tremendous potential to save STP construction costs for small load removals when compared to bmp and technology adoption on farms.

We look forward to working with your agency as this concept is explored and implemented. A final suggestion is to encourage you to provide a few meetings and opportunities for folks from the three sides - regulatory, buyers and sellers - to come together, build an open network for exchanging information on how to make this a successful option for all three sides of a successful program.

Sincerely,

W. Jay Gordon