

*Submitted via email on August 31, 2016*

Washington State Department of Ecology  
Water Quality Program  
Attn: Jon Jennings & Maia Bellon  
PO Box 47696  
Olympia, WA 98504-7696

CC:  
Office of the Governor  
Attn: Jay Inslee  
PO Box 40002  
Olympia, WA 98504-0002

Re: Comment on 2016 draft Concentrated Animal Feeding Operation (CAFO) General Permit

### **Department of Ecology,**

Washington faces a water quality crisis. Please consider the state of Puget Sound's impairment and insufficiently scaled recovery efforts when considering this permit.

The state's Concentrated Animal Feeding Operation (CAFO) General Permit must require safer, science-based procedures for handling manure from agriculture operations, and ensure that untreated fecal coliform bacteria and nitrates don't enter our groundwater, creeks, rivers and the Puget Sound.

The draft CAFO permit would not adequately manage or prevent agriculture pollution from harming our waterways. Please create a more environmentally protective CAFO permit and hold all polluters accountable for their impairment to water quality.

Please update the CAFO permit to include:

- 1. Mandatory groundwater monitoring.**  
The draft permit does not require groundwater monitoring, which is the single weakest aspect of the draft permit. This permit must include groundwater monitoring, because it is the only way to determine the amount of nitrates reaching the water table, informing whether or not practices are effectively reducing nitrate pollution.
- 2. Science-based manure application requirements and restrictions.**  
This permit must require sampling BEFORE manure, litter, or process wastewater is applied to the land, not just once per year. Most importantly, it must require soil sampling at 3 ft, to determine whether nitrate pollution is reaching groundwater, below the level absorbed by root systems.
- 3. Science-based riparian buffers for salmon-bearing streams.**  
The draft permit gives agriculture operations alternatives for narrower buffers. It must require the definition of a standard set of science-based best management practices (BMPs) — such as riparian buffer widths that adequately filter nitrates and fecal coliform bacteria.
- 4. Implementation of best technology for CAFO operations.**  
The draft permit does not require implementation of best-available technology, such as synthetically lined manure lagoons. This permit must require the phasing in of synthetically lined manure lagoons complete with leak-detection systems, or the use of above-ground steel tanks for manure storage.
- 5. Adequate agency funding to implement permits.**  
An effective permit must acknowledge the need for adequate funding for state agencies to provide enough staff to perform inspections and ensure that the permit is enforced.

Thank you for your work to protect, preserve and enhance Washington state's land, air, and water for current and future generations. When considering this draft permit and the improvements that must be made, please remember that the waters of Washington state belong to every name on this petition, and their grandchildren.

With respect,

Ann Russell  
Clean Water Program Manager  
RE Sources for Sustainable Communities  
360-733-8307  
[annr@re-sources.org](mailto:annr@re-sources.org)

**This letter is submitted on behalf of 739 citizens who added their names to the above letter via paper petitions and online forms.**

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Teresa Allen, Deming, WA  
Coco Breen, Deming, WA  
Jillian Froebe, Deming, WA  
Lorena Havens, Deming, WA  
Jim Hildt, Deming, WA  
Jeffrey Margolis, Deming, WA  
Amy Margolis, Deming, WA  
Leaf Schumann, Deming, WA  
Kathleen Unsitalo, Deming, WA  
Carol Olivier, Des Moines, WA  
David Turnoy, Eastsound, WA  
Abigail Ernest-Beck, Ellensburg,  
WA  
Chris Armstrong, Everett, WA  
Michael Lapointe, Everett, WA  
Kaitlyn Ricks, Everett, WA  
S. P. Almskaar, Everson, WA  
Linda Burns, Everson, WA  
Joseph Knight, Everson, WA  
Ronna Loerch, Everson, WA  
Stacy Neal, Everson, WA  
Scott Thompson, Everson, WA  
Elizabeth Dawn, Federal Way, WA

Jerry Bedlington, Ferndale, WA  
Chris Brod, Ferndale, WA  
Erica Burn, Ferndale, WA  
Kim Cooper, Ferndale, WA  
Jaye Cooper, Ferndale, WA  
Deborah J. Cruz, Ferndale, WA  
Judith Culver, Ferndale, WA  
Maria DeMars, Ferndale, WA  
Andy Eddy, Ferndale, WA  
Lane Giannone, Ferndale, WA  
Fred Karlson, Ferndale, WA  
Reg Lake, Ferndale, WA  
Joseph Lebitz, Ferndale, WA  
Scott Mauermann, Ferndale, WA  
Wendy McDermott, Ferndale, WA  
Julia Orloff, Ferndale, WA  
Karen Price, Ferndale, WA  
Bette ann Schwede, Ferndale, WA  
Shana Ahken, Friday Harbor, WA  
Richard Grout, Friday Harbor, WA  
Cindy Hansen, Friday Harbor, WA  
Shaun Hubbard, Friday Harbor,  
WA  
Linda Knowlton, Hoodspport, WA  
Kevin Fairshon, Kendall, WA  
Gary Lynd, Kent, WA  
Mary Gleysteen, Kingston, WA  
Marilyn Liden Bode, Kingston, WA  
Madison Lind, Kirkland, WA  
Marika Weber, Kirkland, WA  
Becky Hardey, La Conner, WA  
Lynn Karns, La Conner, WA  
David Karns, La Conner, WA  
Ursula Mass, La Conner, WA  
Ron Shirley, La Conner, WA  
Dean Alker, Lake Stevens, WA  
Tracy Alker, Lake Stevens, WA  
Karissa Jones, Lake Stevens, WA  
Karin Glaeser, Leavenworth, WA  
Elisabeth Robson, Lopez Island,  
WA  
Kathleen Gallaglen, Lummi Island,  
WA  
Charles Meyers, Lyman, WA  
Eva Pielacha, Lyman, WA  
Charis Gilbert, Lynden, WA  
Dorothy Jordan, Lynden, WA  
Amy McKay, Lynden, WA  
Wilma Totten, Lynden, WA  
Kathy Goldsmith, Maple Falls, WA

Amy Mower, Maple Falls, WA  
Tom Borst, Marblemount, WA  
Amy Hammer, Marblemount, WA  
Glenda Alm, Mount Vernon, WA  
Jim Birdsall, Mount Vernon, WA  
Codi Hamblin, Mount Vernon, WA  
Richard Kent, Mount Vernon, WA  
Timothy Manns, Mount Vernon, WA  
Anne Middleton, Mount Vernon, WA  
Dennis Parent, Mount Vernon, WA  
Lorna Parent, Mount Vernon, WA  
Karen Richman, Mount Vernon, WA  
Bonnie Rohrer, Mount Vernon, WA  
Doug Rohrer, Mount Vernon, WA  
Samantha Russell, Mount Vernon, WA  
Joshua Smith, Mount Vernon, WA  
Patricia Warden, Newcastle, WA  
Rick Colombo, Oak Harbor, WA  
Kevin Alexandrowicz, Olympia, WA  
Irene Hinkle, Olympia, WA  
Gaius Horton, Olympia, WA  
Jaime Liljegren, Olympia, WA

David Schroder, Olympia, WA  
Gladys House, Port Angeles, WA  
Judy D'Amore, Port Townsend, WA  
Eileen Deutsch, Port Townsend, WA  
Rachel Lynd, Puyallup, WA  
Sean Edmison, Redmond, WA  
Nancy Shimeall, Redmond, WA  
Lois Canright, Rockport, WA  
Jill Bargones, Seattle, WA  
Courtney Baxter, Seattle, WA  
June Eisenman, Seattle, WA  
Paul Fredrickson, Seattle, WA  
Anthony Gervais, Seattle, WA  
Richard Grant, Seattle, WA  
Helen Gribble, Seattle, WA  
Martha Groom, Seattle, WA  
Lorraine Hartmann, Seattle, WA  
Paige Heggie, Seattle, WA  
Evelyn Jarosz, Seattle, WA  
Daniel Kostek, Seattle, WA  
Emily Krieger, Seattle, WA  
Ann Lev, Seattle, WA  
Michael McBride, Seattle, WA  
Erica Meade, Seattle, WA  
Mark Peterson, Seattle, WA  
Nancy Preg, Seattle, WA

Constance Rodman, Seattle, WA  
David Roth, Seattle, WA  
Joanna Schoettler, Seattle, WA  
James Schulz, Seattle, WA  
Shelli Christian Stojetz, Seattle, WA  
Susan Ward, Seattle, WA  
Sean Wooster, Seattle, WA  
Jim Johnson, Sedro-Woolley, WA  
Donna Mason, Sedro-Woolley, WA  
Dee Cantlon, Sequim, WA  
Amy Georgeson, Shelton, WA  
Barbara Cornell, Shoreline, WA  
Molly Stojetz, Shoreline, WA  
Chris Tompkins, Shoreline, WA  
Rachel Fresonke, Snohomish, WA  
Mary Hale, Snohomish, WA  
Kathleen Callum, Spokane, WA  
Sammy Low, Stanwood, WA  
Adina Parsley, Stanwood, WA  
Pamela Deatherage, Tulalip, WA  
Rae Youngberg, Twisp, WA  
Meagan Howard, Vancouver, WA  
Katelyn Schoof, Vancouver, WA  
Manuel Hernandez, Yakima, WA  
Stefan Pashov, WA

### **Outside Washington state**

Brita Mjos, Anchorage, AK  
Ron Braziel, Chico, CA  
Delores Dean, Chico, CA  
Peggy Williams, Magalia, CA  
Alice Smith, Palo Alto, CA  
Christine Johnston, San Clemente, CA  
Claudia Gibson, Fairfax, CA  
Sherwin Peterson, Sylmar, CA  
Laura Ireland, Grand Jet, CO

Cynthia Alden, Fryeburg, ME  
Kelly Allison, Berlin, MD  
Nancy First, Northampton, MA  
Amy Hansen, Asbury, NJ  
Ronald Beaudrie, Levittown, NY  
Rietje Bolleman, Amsterdam, Noord-Holland  
Sharon Hunt, Aloha, OR  
Taylor Bethell, Lake Oswego, OR  
David Lunde, North Bend, OR

Frank Gadea, Portland, OR  
Kelly McConnell, Tigard, OR  
Sharon Holford, Portland, OR  
Lindsey Caudill, Austin, TX  
Elizabeth Smith, Austin, TX  
Elaine Becker, Roanoke, VA  
Bern Haggerty, Laramie, WY  
Jessica Urbanec  
Patricia Weston