



July 15, 2022

Chelsea Morris

WA State Department of Ecology

P.O. Box 47696

Olympia, WA 98504-7696

Re: Comments Regarding Draft Concentrated Animal Feeding Operation General Permits

Dear Ms. Morris:

Washington Cattle Feeders Association (WCFA) represents 25 feed yard operators throughout Central and Eastern Washington growing and finishing approximately 500,000 head annually. WCFA provides the following comments on the current draft of the Concentrated Animal Feeding Operation (CAFO) general combined and state-only permits.

Solids Storage Areas

Department of Ecology has not demonstrated the need for the requirement that solid materials be stored on low permeability soil pads. This requirement should be entirely removed from the general permits, until such time as Ecology presents data indicating a reasonable potential for solids storage areas to have an adverse impact on groundwater quality.

Should some form of the requirement for solid storage areas be retained, Ecology should make the following changes:

- Solids Storage Area requirements should only apply in wetter areas. Ecology has drawn a distinction in the permit between the wetter and dryer areas of Washington. To the extent there is a potential for leaching of nutrients from stored solid materials, it is not likely to pose an issue in the dryer areas of the state (those averaging less than 25 inches of rainfall annually).
- Feed storage areas should be excluded. WCFA is not aware of any evidence that rainfall causes a material amount of nutrients to leach from hay, silage and other feed components.

Liquid Waste Storage Ponds

The draft permits require an assessment of waste storage ponds (labeled “lagoons” under the current permit) by a qualified expert using NRCS procedures within two years of permit coverage. This assessment requirement was added to the CAFO permit in 2017 and facilities that were subject to that permit already have completed these assessments. A provision should be added to the permit providing that this is a one-time requirement and that facilities that previously completed assessments are not required to do so again.

Monitoring

Condition S.4.C.3 would require weekly monitoring of liquid waste storage ponds and solids storage areas. This is too frequent, particularly for solids storage areas. It is unlikely that conditions will materially change in a week. Monitoring frequency should be reduced to once a month.

WCFA requests that Ecology make these changes to the draft permits, as each of the changes would materially reduce the burdens imposed by the current provisions of the draft permits.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Field", written in a cursive style.

Jack Field, Executive Director
Washington Cattle Feeders Association