This method will be expensive, will place a heavy load on administrative staff, and will be full of unnecessary procedures. Tackle suspected wastewater sites by simply testing nearby.

Ground water should be tested in subject areas and proven to be affected by local CAFOs first, with the test data accessible in public domain. Once groundwater is shown to be affected by two independent analysts over a conservative duration, the local CAFOs shall come together and utilize county funds to improve their wastewater systems.

Small CAFOs (e.g. 1-20 cows) should not be placed under the same procedures as larger CAFOs. Taxing or fining small farms or organic families is absurd.

A CAFOs location should also be taken into consideration. Rural CAFOs in large, unused aquifers shouldn’t even need to register.