

# Orca Conservancy

To Whom it May Concern,

I would bring forward in comments, those submitted by Executive Director Shari Tarantino on August 14, 2022 for Orca Conservancy. I would also emphasize the following 6 concepts:

The WA Department of Ecology must make the following changes to the CAFO General Permit Reissuance:

- 1) Implantation of best management practices based on science which includes mandatory riparian buffers;
- 2) Implementation of "all known, available, and reasonable methods of prevention, control, and treatment" (AKART) for existing manure lagoons and compost areas;
- 3) Completely prevent violations of surface water quality standards and groundwater quality standards as outlined in Ch. 173- 201A WAC and Ch. 173-200 WAC, respectively;
- 4) Implement monitoring practices (visual inspections and soil sampling) sufficient to ensure compliance;
- 5) Provide public participation in the development of site-specific nutrient management plans, as required by the Clean Water Act;
- 6) Consider the effects of climate change, as required by Washington State Environmental Policy Act (SEPA).

Sincerely,  
Steven Christianson, Esq. - President, Orca Conservancy