

James Creer

I imagine over 95% of Washington State residents are not owners of CAFOs. It would help if you would define what a Non-CAFO normally is since Table 2 insinuates a small CAFO could potentially/routinely consist of one animal. You could caveat the general definition of a Non-CAFO with a statement to the effect that if a Non-CAFO was found to be, or have a reasonable potential to be a surface or ground water pollutant, Ecology could require a general or combined permit to be submitted. This would help to calm down those that see Table 2 as a threat on small numbers of animals in areas where surface and ground water present minimal problems, because Table 2 infers all it takes is one animal. In addition, you include definitions of "wetter" and "drier" climates, but you don't include "extremely dry" climates of 10 or 12 inches or less annually. Much of Eastern Washington has an "extremely dry" climate with no surface or ground near enough to be of pollution concern. 10 or 12 inches or less moisture annually is much more pollution friendly than 25 plus/minus inches relative to surface run-off in the Spring.