

## JJ Lindsey

I'm very concerned about the many problem issues which CAFO's create.

As a vegetarian, my vast preference would be to never see a cow have to live under such conditions which cruelly fail to recognize that they are sentient and worthy life forms, not just 'food'.

I strongly request that we SEE these operations in all their polluting, cruel, methane-producing truth. We need to commit to the acknowledgement of these truths, and legislate and make rules accordingly.

Particularly concerning:

~ DOE has failed to consider the impacts of climate change in authorizing CAFO discharge into our waterways. THIS IS CRUCIALLY IMPORTANT IN THIS DAY OF CLIMATE CRISIS, AND MUST BE PRESENT GOING FORWARD.

~ In your draft, there is no requirement for all Washington CAFOs to obtain permits. This means that over 200 WA CAFOs are discharging to ground and surface water, and no one is measuring the discharge or regulating it. How are we allowing this under federal Clean Water Act?

~ Washington is looking at requirements for riparian buffers and DOE has developed draft guidelines that will protect salmon from pollution and save salmon habitat. THESE GUIDELINES SHOULD BE AN ENFORCEABLE PART OF THE CAFO PERMIT...BUT THEY ARE NOT!

~ There are 53 CAFO dairies in Western Washington flood plains.

Last fall, DOE spent a lot of money helping Whatcom County farmers pump manure out of lagoons to prevent polluting during extreme flooding. With Climate Change, these extreme weather events will increase, including flooding that sends pollutants directly into the rivers and into Puget Sound.

~ DOE has an obligation to define "All Known, Available and Reasonable Technology" (AKART) for CAFOs, and we don't see that definition in the permit. Where is it??

~ Manure lagoons contribute to global warming.

Storing manure in lagoons produces methane, a Green House Gas (GHG) far more potent than CO2. Washington State sends over a million metric tons of GHG CO2 equivalent into the atmosphere every year from manure lagoons. When cows are kept on pasture, this does not happen. Farmers may have followed the best available advice when they built lagoons years ago. They were told and they believed, that lagoons would protect the environment. Now, we know that the side effects are huge, and we wish to see farmers assisted in transitioning away from this practice.

Please, CAFO's should not exist. They are unhealthy places for both cows and those that consume them, AND for the world due to their polluting and toxic contributions.

We need strict rules for how these exist in our environment.

Please take this seriously and make conscientious and safe rules under which these operate.

Thank you~