

North Yakima Conservation District

Chelsea Morris
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

RE: Concentrated Animal Feeding Operation (CAFO) General Permits Reissuance

Dear Ecology,

The North Yakima Conservation District (NYCD) wishes to submit the following comments.

NYCD has no formal comment on the "reissuance" guidance at this time related to the larger CAFO permits. However, we would encourage any current or future policy changes to promote the use of voluntary conservation as a first alternative to regulation. The role of Conservation Districts serves this voluntary process perfectly. Historically the Department of Ecology and the 45 Conservation District of the State had in-place, functioning agreements for "water quality referral" complaints. Within these agreements DOE and the individual CD agreed to how any complaint would be addressed. The different levels (4) described the formal relationship between the two parties. The agreement(s) were developed based upon the CD's capabilities to provide technical assistance and or cost-share to address the complaint. The goal of these agreements was the protection of water quality in an effective, cooperative, informative manner where all parties' goals are met. Historically this process was highly effective at implementation of practices that met W/Q standards. NYCD believes that this "agreement" process would still be effective if placed into the policies related to all CAFO / AFO regulation. Reverting to the use of these agreements also addresses Ecology's own finding that application of standards (CAFO) to small operations has a "disproportionate expense" to those farms.

It has been NYCD's experience that when we work with any landowner on water quality issues, we have gained more in the end through a cooperative process rather than a regulatory process. In doing so the NYCD has also maintained local customs and culture related to agriculture and land use. The benefit of doing so has multiple outcomes such as local food security, environmental awareness as well as protected water quality. The NYCD would welcome any discussion related to our comments. Please contact Michael Tobin, NYCD Manager if necessary (mike-tobin@northyakimacd.org).

Sincerely,
NYCD Board of Supervisors
Mr. Gail Thornton
Mrs. Cindy Reed
Mr. George Cameron
Mr. Dustin Melius
Mr. Frank Hendrix

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