

Alex Williams

I am a Washington resident and I am not satisfied with the Draft Concentrated Animal Feeding Operation (CAFO) General Permit proposed in June. The permit does not require adequate technology, or sufficient monitoring and reporting, to prevent pollution from reaching our waterways. This draft permit ignores the Department of Ecology's published science showing decades of damage to Washington's waterways as a result of pollution from excess nitrates, E. coli, fecal coliform bacteria, and various other pollutants being discharged by the mega-dairies, beef feedlots, and other CAFOs across the state.

As a Washingtonian, I expect the Department of Ecology to uphold its commitment to "protect, serve, and enhance Washington's environment for current and future generations." I fear that this permit will only allow for more destruction of my state's environment and lead to a bleaker future for all, but especially for those who live, recreate, and work at or near these facilities. If your department truly strives for "equity and environmental justice," it must fully consider the ongoing impacts of CAFOs on Washington's waters, lands, residents, and EJ communities when drafting its final permit.

In the final permit, your department should make the following major changes: (1) implement feasible modern technology (AKART) as required by the Clean Water Act, such as impermeable lining for liquid and solid waste storage lagoons; (2) implement soil, surface, and groundwater monitoring that will sufficiently detect pollution; (3) safeguard against the overapplication of waste to lands; and (4) implement meaningful discharge limitation standards and best management practices to comply with water quality standards to keep waterways fishable, swimmable, and drinkable.

The Department of Ecology must do what the court ordered you to do in the re-issued permit and protect people, water, and aquatic life from pollution. If you do not significantly improve this permit now, you will not fulfill your duty to protect Washingtonians and our environment from further degradation.