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The Department of Ecology has failed to include consideration of the impacts of climate change in authorizing CAFO discharge into our waterways.

The draft permit guidelines do not require all WA 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.

Washington state's guidelines for riparian buffers to reduce pollution and protect salmon should be an enforceable part of the CAFO permit, and they are not.

There are 53 CAFO dairies in Western Washington flood plains. Many of these large dairy operations are in areas with very high water table. The water quality in these areas has been terrible for years. Many of Ecology's studies have made many recommendations to improve water quality. Still, last fall, Ecology spent several hundred thousand dollars helping Whatcom County farmers pump manure out of lagoons to prevent overtopping 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.

Ecology must define "All Known, Available and Reasonable Technology" (AKART) for CAFOs, and we don't see that definition in the permit.

Manure lagoons contribute to global warming. Storing manure in lagoons produces methane, a GHG far more potent than CO₂. Washington state releases 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.

The permit guidelines do not seem to address the inhumane living conditions of the cattle in these large facilities. If animals were not confined in these ways, our environment would be better, cows and human workers would be better off too. Farmers need realistic and thoughtful guidance to transition away from CAFOs.

Thank you.