



PO Box 424 | Everson, WA 98247 | (360) 815-4361

August 12, 2022

Chelsea Morris
Washington State Department of Ecology
P.O. Box 47696
Olympia, WA 98504-7696

Email: CAFOpermit@ecy.wa.gov

Re: CAFO permit comments

I am writing on behalf of Save Family Farming to comment on the proposed CAFO permit. Save Family Farming represents the farming community and serves to protect Washington's family farming community through advocacy, outreach, and public education. There are a number of concerns that would make this permit impractical and unworkable for any farmer required to get this permit. Please consider adjusting the permit in the following areas:

1. Post Harvest Soil Sampling: page 22. Section S.4.J Sub 3. Setting a date of October 1st and after harvest for the fall post harvest nitrate test simply isn't compatible with farming practices. In most years harvest of crops isn't completed until after October 1st. Please adjust this to October 31st. Creating a requirement that is an impossibility to meet immediately sets the permit holder up for failure and needs to be adjusted.
2. Pages 33-34. Section S5.B.(2) Total Kieldahl Nitrogen testing (TKN) requirement. TKN is not a valuable tool at all in measuring nitrogen. Please revert back to the previous permit testing requirements for Organic Matter and Ammonia/Ammonium.
3. Page 25. S4.K (3.f) Using t-sum 200. This science was formulated for Western Washington farms, not Eastern Washington. Requiring this will leave our EW farms in an untenable position when applying nutrients. As with the t-sum 200 discussion, requiring something that would be virtually impossible to comply with sets a permit holder up for failure before he even begins. Please consider t-sum 100 as a better guideline for our Eastern Washington Farms.

Sincerely,

Fred Likkel,
Interim Executive Director, Save Family Farming