

King Conservation District

Hi,

I am making a comment on The Voluntary Clean Water Guidance for Agriculture, Chapter 11 - Livestock Management-Animal Confinement, Manure Handling & Storage.

Page 14 & 19, under Site Section, " Manure storage sites should be located away from any surface water (perennial, intermittent, or ephemeral). Consistent with the Riparian Areas & Surface Water Protection recommendations (Chapter 12) manure storage facilities should be located outside the riparian management zone (at least 215-feet away from surface waters for western Washington locations and 150-feet away from surface waters for eastern Washington locations.10."

1. Do you have a scientific article that shows that 215 feet & 150 feet is the right setback for Manure storage facilities from surface water? Where did this number come from? I would recommend having a scientific basis for such a setback number. The footnote here should refer to the article.

2. There is the footnote "10" for the setback, however many farms in western Washington might not have any of their farm that is over 215 feet from a surface water. There should be additional guidance for in the document for when manure storage must be located with-in 215 feet. King County Livestock Mangement Ordinance (for example) has a tiered approach to regulations of manure near surface water. Basically: Prefer 200 feet away. 200 - 100 feet - tarping or roof is required in winter. 100 - 50 feet - manure bin much have leachate containment. 50 - 0 feet - Not allowed.

Thank you,

Jay Mirro