



Twin Harbors Waterkeeper  
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Via email

April 10, 2026

Subject: Early feedback on the current permits Concentrated Animal Feeding Operation General Permits

Dear Heather,

Thank you for this opportunity to provide early feedback on the Concentrated Animal Feeding Operation General Permit (CAFO). I greatly appreciate that you have taken the time to discuss some of my concerns with me over the phone.

The mission of THW is to protect and improve water quality and marine and freshwater habitats on the Washington Coast including Westport and the watersheds of the Hoh, Quillayute, Queets and Quinault and Chehalis Rivers and the Chehalis River Estuary and Willapa Bay Watershed. Twin Harbors Waterkeeper works to address environmental health disparities that are driven by legacy and current pollution and systemic inequities that disadvantage communities of color and lower income populations on the Washington Coast. When we prioritize clean water, we are also prioritizing the health and well-being of our community, especially our youth and elders. We submit these comments on behalf of our members.

My comments are based in my personal experience observing manure applications over the last 20 years, in several parts of Washington State. I currently live less than a mile away from a WA Licensed Cow Milk Dairy. I am aware that there are 9 licensed dairies in the Chehalis watershed, and 3 CAFO GP facilities, which are poultry farms. A few miles south of my home is the Bob Oke Game Farm, which recently gained coverage under the State-only CAFO permit.

Some of my observations and concerns are listed below:

1. The James Road Dairy is listed as a "large" facility. According to my calculations (based on the [WA Department of Agriculture website](#)), it could house as many as 2,996 animals. I realize that not all of them are confined, but many of them are. From what I can view from the public road, it appears that there are four manure lagoons at this facility. From Google Maps, I measure that one of the lagoons is about 225 feet from Prairie Creek, and about 837 feet from the Chehalis River. Often the lagoons appear to be extremely full, to the top of the lagoon berm. Are these lagoons lined? Are there any systems in place to detect whether the lagoons leak? How often are the lagoon's berms inspected for integrity?

2. I am concerned about the possible lack of adequate storage at the James Road Dairy. I notice constant tanker truck traffic during most of the year. I am aware of two above-ground tanks in the area, which I have observed tanker trucks from James Road Dairy traveling to and from. Do these offer enough storage capacity? What happens if there is inadequate storage, such as during an atmospheric river or flood?
3. I am aware that manure is transported to many fields from the James Road Dairy. Who owns all these fields, and who checks to make sure that manure is applied at agronomic rates? How often is soil testing required?
4. I have seen manure applied to fields that flood, as the Chehalis River is prone to flooding. Are special rules in place to restrict manure applications in the flood plain?
5. Concerning the Bob Oke Game Farm – private wells in the vicinity became contaminated with nitrate pollution. The facility very recently gained coverage under the State-only permit. Portions of the fields where pheasants are raised are about 1,654 feet from the Chehalis River, and there are residences nearby, some with private wells. The City of Centralia has connected some residents to City water. Are all residences that might be within the contaminated groundwater plume connected to City water? Are any protective measures in place, such as regular groundwater testing, in place to make sure that drinking water wells in the vicinity are safe?

Because of these concerns, I have the following requests for your consideration while drafting the next CAFO permit.

- For poultry CAFOs that export litter and composted litter, please require that the amount/volume/weight of the composted litter be quantified and reported. Please require the producer to document where/who/when the material was delivered to.
- For CAFOs that need to export to balance nutrients, please require an agreement to have all records necessary to prove agronomic use of nutrients on the exported fields.
- If there are residences with private wells within one mile (or downgradient) of any permitted CAFOs, please require that annual testing of these wells be performed.
- Please require that dairies that confine over 1500 cows gain coverage under the CAFO permit whether regardless of whether they have a documented discharge.
- Please consider requiring all CAFO permittees to have manure transfer agreements for off-property manure exports. Please require that records of number and locations of off-property transfers be documented as part of the permit requirements.
- Please put provisions in place to prevent manure applications to mapped flood plains during the winter months.

I appreciate your attention to my concerns.

Respectfully,

Lee First

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