Washington State Dairy Federation (W. Jay Gordon) Anonymous Anonymous

For the record, my name is Jay Gordon. I am with the Washington State Dairy Federation and an eighth-generation farmer in Western Washington.

A few things for the record, we will be submitting additional comments on this.

99.2% of all the dairy farms in Washington state are family owned. There is one WSU dairy that is not, and there's another dairy that is a corporate dairy. Our oldest dairy family in the state has been milking cows since the 1300s.

Over 700 years, they've learned how to take care of and feed and care for animals. A confined animal feeding operation is what we do. It's used as an expletive, but we can find animals in things called barns. We feed them because not feeding them would be animal abuse.

It gets old hearing that CAFOs are polluters. The Department of Ecology, the Department of Agriculture, the EPA, and the local health districts all have regulatory authority on various aspects of dairy farming. Dairy farmers are the most regulated sector of agriculture. Dairy farmers do not pollute. Our intent, our plans, our everyday activities are to prevent that.

Go down the hall, Adam, and ask Department of Ecology has a division that regulates dairies. Ask them when the last time they farmed a dairy. If we pollute so much, why do we have so few, if any, penalties by EPA, Ecology or the Department of AG?

Every dairy in the state without exception has a manure storage system that produces some methane. Those systems were put in in the 60's, the 70's, the 80s and the 90s to prevent pollution. That includes small farms, large farms, old farms, farms that are growing, which we do.

There is no proof that adding a methane digester expands dairy.

The profit levels amongst our 6th digesters in Washington are abysmal. They are struggling to stay afloat. They are not making a profit. It does not drive growth. It is not a profit center and it is not something that's going to attract Shell Oil to buy our dairies to make methane.

A 14-year avoided methane credit is too short to support the capitalization to catch the methane that we have coming off of our lagoons to the last 30-40. Fifty years of getting rid of the avoid of methane would shortchange an energy source, it would shortchange the environment, it would shortchange the dairy farmers ability to reduce their carbon footprint.

Thank you and we will be submitting comments.