



Memorandum

TO: Whatcom County Planning Commission

CC: Mark Personius
Cliff Strong

FROM: Joshua Fleischmann

DATE: February 16, 2021

SUBJECT: Manure Management in SMP Jurisdiction

The Whatcom County Agricultural Advisory Committee (AAC) would like to take this opportunity to provide feedback on publicly suggested amendments to the DRAFT Shoreline Management Program (SMP) that may adversely impact members of the farming community.

Specifically, we are concerned with suggested amendments that, if implemented would require manure holding facilities within SMP Jurisdiction to be in the form of above-ground tanks or towers, rather than earthen lagoons. The suggested amendment would also require review through a Shoreline Conditional Use process, rather than the present Shoreline Substantial Development process. We understand the intent of these suggested amendments to be for the protection of surface water and groundwater quality. We believe these suggested amendments to be unnecessary.

First, protection of surface water and groundwater is already achieved through the Shoreline Substantial Development permitting process. It is unclear that the Shoreline Conditional Use permit process would provide additional environmental protections. What is clear is that it would increase permitting costs and review times, including additional review by the Washington State Department of Ecology (Ecology). The SMP update must be reviewed and approved by Ecology. If a different permitting pathway is to be required, rather than amending the draft SMP in response to a citizen comment, we suggest Ecology require this change if they deem it necessary.

Second, we believe a site specific evaluation is necessary to determine whether an above ground tank/tower would provide greater water quality protection than a traditional manure lagoon. Lagoons have improved over time, where engineering and impervious lagoon liners (clay or synthetic) are now standard practice. While it may be true that above-ground tanks or towers provide greater protection of water quality under certain circumstances, we do not believe them to be superior in all situations. Therefore we believe the choice in type of manure holding facility should be determined on an individual basis.

Finally, we appreciate the opportunity to provide feedback if additional amendments which may impact the agricultural industry are considered by the Planning Commission.

If you have any questions, please do not hesitate to contact Joshua Fleischmann, the AAC's Planning and Development Services staff contact, at 360-778-5952

Respectfully submitted,

Joshua Fleischmann

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Agricultural Advisory Committee Staff Support

Signed on behalf of the Agricultural Advisory Committee Members:
Jeff Rainey Matthew McDermott Jagjiwan Brar Steven Groen
Barb Hento Dakota Stranik Robin Fay Larry Davis