



# Michigan Resource Stewards

Resource Professionals Continuing a Tradition of Service

Arminda Koch, President James Maturen, Vice President Gregory Eagle, Secretary Jim DeClerk, Treasurer

December 11, 2019

Megan McMahon  
Michigan Department of Environment, Great Lakes, and Energy  
Permits Section, Water Resources Division  
P.O. Box 30458  
Lansing, Michigan 48909-7958

Re: Comments and Support Related to CAFO General Permit Proposal

The Michigan Resource Stewards (hereafter "Stewards") wish to express their support of the changes to the Michigan Concentrated Animal Feeding Operation (CAFO) regulations as recently proposed by the Michigan Department of Environment, Great Lakes and Energy. The Stewards are an organization of natural resource professionals continuing a tradition of service to the people of Michigan focused on the proper management of the environment and natural resources.

The proposed changes seem to make significant improvements in proper management of animal waste from CAFO operations who use the general permit in lieu of an NPDES permit. The changes increase the obligation of animal operations to manage their waste as a valuable nutrient commodity rather than an animal waste product. Further, the changes make great strides in reduction of the offsite migration of nutrients and pathogens into Michigan surface waters, wetlands, and drinking water supplies. Our conclusion is that the changes are science based and warranted.

We believe these changes are justified in light of the paramount interest of quality natural resources and public health prescribed in the Michigan Constitution of 1963. Scientific research performed and summarized by Dr. Joan Rose of Michigan State University ([rosejo@msu.edu](mailto:rosejo@msu.edu)) points to the extreme threat posed to the environment and public health by improperly managed animal waste. She prescribed the need for effective management and monitoring to reduce the chance of public exposure to disease from contact with contaminated surface waters and groundwater. Michigan must not experience the animal waste related death and sickness that was experienced in Walkerton, ON, where 2300 people experienced sickness and 7 people died. Approximately 23% of Michigan citizens rely on groundwater for their drinking water. Many municipalities face impact to their water wells and surface water withdrawal sources from CAFO discharges. Dr. Rose's information shows that over 50% of animal waste contamination results from high rainfall events, floods and storms. This precipitation vector can only be expected to increase as climate changes pose greater extreme weather events. As farms increase their installation and usage of under field tile drains, in response to the greater need to remove rainfall and snow melt, the transport of nutrients via these tiles increases as well. Dr. Rose also reports that streamflow (spring melt) was the strongest predictor of

Affiliated with Michigan United Conservation Clubs and the Michigan Environmental Council

Member of Michigan Environmental Council

Website: <http://www.miresourcestewards.org/>

Facebook: <http://www.facebook.com/miresourcestewards/>

bovine and porcine marker pathogen concentrations. General permit provisions to reduce offsite migration, requiring the ability to store six months of waste accumulation, preventing winter application, and transparent record keeping available to the general public all are important changes and seem based on past experience and sound science.

The Michigan Resource Stewards understand the challenge that these new general permit requirements pose to Michigan farmers; but, these waste management and record keeping challenges should not be used to preclude the right of clean water afforded to Michigan citizens. Also, significant funding and cost share programs exist to assist producers facing hardship while little public funding exists to mitigate environmental damages. Often CAFO operations comprise large corporate entities who, absent environmental justice considerations, have a greater influence on rules that regulate their conduct. Rural areas often do not have that level of influence or voice and must be afforded a greater sense of environmental justice. We believe these changes serve the environment, public health, and equal justice to all.

On behalf of Michigan Resource Stewards and with respect,

Gregory C. Eagle, Secretary  
Michigan Resource Stewards  
1025 E. Price Road  
Midland, Michigan 48642  
(989) 513-2508

Affiliated with Michigan United Conservation Clubs and the Michigan Environmental Council

Member of Michigan Environmental Council

Website: <http://www.miresourcestewards.org/>

Facebook: <http://www.facebook.com/miresourcestewards/>