

Nadja Galadram

Chelsea Morris 17 Aug. '22
Washington Department of Ecology
PO Box 47696, Olympia Wa 98504-7696

Dear Chelsea

I oppose the CAFO rules as drafted. I agree with the comments of Okanogan, Thurston and Yakima County Farm Bureaus. For example:
https://www.capitalpress.com/ag_sectors/livestock/farm-bureau-chapters-seek-to-limit-ecologys-reach-on-cafo-permits/article_90928700-1385-11ed-8730-3fab8cfffcc.html

We need to work with those who raise livestock on a small scale providing locally sourced food, or even have a small egg business with the households on their road, for example. Work with, since the Dept of Ecology does NOT have an active presence on the ground with the folks you propose to regulate. Work with, as in help the Conservation District and other groups who already have the "in" with people keeping livestock or poultry at home -- to knowledgeably and voluntarily handle the waste themselves, if they are not.

This measure would add enormous hardship on the very folks we should support and applaud for their efforts to provide local food, even if only for themselves. Especially this year and next to come, with supply chain issues, crop failures and small business struggles. My rural clients have been far more saavy about working long term with nature to preserve nature day to day, than those in Lacey and Olympia who keep no chicken or livestock, regardless of their environmental ideals. Look at the landscape practices!

Ecology must recognize the work of the Voluntary Stewardship Program and local conservation districts, as well, and support them, not force them, with informal and funding resources to do what they are already chartered to do. They have helped many poultry and livestock owners I've known since the 90's; smart, warm, respectful and convincing, co-creative. As have I, one by one, listen to and helped them.

Instead of regulating the small animal/poultry holders, Ecology needs to encourage participation in wise voluntary programs, proven to protect water quality. With all respect, I know from my own work to protect the environment, working with just such people since 1989, that these backyard gardeners and homesteaders, want to protect their water quality, long term investment and put into action, many changes in practice we devised together. Top down never works, people! Once fees are levied they only go UP. I learned that there are many services, businesses and groups that already have the trust of the "small animal and poultry caretakers" who could be involved in galvanizing good practices, where needed.

This proposal is near-sighted, rather than the "far sighted" solution it purports to be, "for the planet." The planet starts here in our own State, on each plot of land. Not with a one size fits all program such as CAFO is proposed to be. But involving grass roots water protection, by educating and supporting the grass roots in new ingenious ways. Starting with listening to the land owners themselves, what they face, what they have tried and do, where they need help. Generally they have a keen intelligence. Consider asking the Dispute Resolution Center to facilitate meaningful problem solving from the bottom up. Helping the small holders, is in the best interest of every region in Washington State.

Sincerely, Nadja Galadram, Let's Grow Soil: Lab & Support, letsgrowsoil@fairpoint.net,
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