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I wish to focus on a major flaw in the CAFO program. Specifically related to small CAFOs. Ecology should rewrite section S1 of the CAFO General Permit to eliminate the small CAFO designation

This provision should be eliminated due to Ecology's own finding that application of CAFO standards to small operations has a "disproportionate expense" to those farms. (Economic Impact Analysis 2017 and 2022)

Additionally, the definition of small CAFO (less than the number of animals for a regular CAFO), is overly broad and not understood as to the significant implications on Washington rural residents. The predominant understanding is that the CAFO designation applies to feedlots and larger operations that concentrate significant numbers of animals. Few outside of large commercial operations are even aware of the Small CAFO provisions, let alone the fact that they could apply to a "herd" of one animal as well as to animals not specifically listed in the permit language. This definition must be changed to eliminate anyone other than the large feedlots who actually ARE concentrated feeding operations.