

irene morgan

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RuralCitizens.org

We Are Citizens For Independent Rural Living, Food Production, And Sound Stewardship

Supporting Your Right

To Grow & Raise Your Own Food

Allowed? Denied! CAFO - Not CAFO?

Ecology's new proposed rules define what a CAFO is using very ambiguous language.

As such, these new proposed rules could (at Ecology's discretion) classify anyone who raises animals as operating a CAFO and be subject to complex and very costly regulations with potential harsh penalties.

WOULD YOU....

- Like Ecology AS YOUR "Landlord"?
- Enjoy Ecology DICTATING whether you can have animals or not?
- Want costly permits & inspections for the "privilege" of keeping animals?
- Be able to afford up to a \$10,000 fine PER DAY?
- Be willing to serve jail-time just for raising animals?

If your answer is NO! – Take Action NOW!

A CAFO is a CONCENTRATED Animal Feeding Operation. The program was designed for confined-feed lots with high concentrations of animals and waste.

A small CAFO is defined by ecology as anything "less than – 150 horses, 300, beef, 15– ducks or 25,00 laying hens."

If you have at least one animal – you could qualify as a small CAFO! Ecology has complete discretion determining if you are a small CAFO.

The Department of Ecology can apply CAFO requirements to small producers, home farmers, and horse owners, as if they were bad stewards.

CAFOs are required to meet invasive and expensive planning and reporting requirements. Ecology admits that CAFO requirements have "a disproportionate impact" on small operations. If you raise livestock; whether they are a hobby, pets, horses to ride, or just chickens for eggs – you are on the hook!

WHAT COULD THIS DO TO OUR ASPIRING YOUNG FARMERS IN 4H AND FFA?

AND – if you plan to use your livestock's manure or "chicken-tea" as fertilizer on your garden, these rules will prevent you from manure application "24 hours before a rain event" – an almost impossible task! Even NOAA cannot reliably predict weather, so how can you work within these arbitrary and capricious parameters?

Do you know where every seasonal pond on your property is? If your livestock come in contact them – you will be in violation!

Fencing every pond is not only costly, but it is not a science based approach. Will you be able to free-range your chickens or let your horse roam your pasture? Not likely...

There Is An Alternative

Ecology must recognize the good work of the Voluntary Stewardship Program and local conservation districts.

Instead of regulating, they should encourage participation in these voluntary programs proven to protect water quality.

WE NEED TO TAKE ACTION

Chelsea Morris
Washington Department of Ecology
PO Box 47696,
Olympia WA 98504-7696

August 14, 2022

Dear Chelsea,

I oppose the CAFO rules as drafted and concur with the comments of Okanogan, Thurston and Yakima County Farm Bureaus.

We need to work with those who raise livestock on a small scale providing locally sourced food. Applying CAFO standards to small operations, will be devastating to local food production and our overall food security.

Ecology must recognize the work of the Voluntary Stewardship Program and local conservation districts. Instead of regulating, Ecology needs to encourage participation in these voluntary programs, proven to protect water quality.

Sincerely,
Irene F Morgan