

# Raul de Leon

Dear Chelsea,

I am totally opposed to the current CAFO language and also opposed to the proposed amendments to the existing rule and completely agree with comments provided by the Okanogan, Yakima-Klickitat, Thurston, Grant, and Benton County Farm Bureaus

Proposed language is vague, broad reaching, and leaves way too much at the discretion of one agency.

There was no public involvement or community outreach, prior to creating these rules and although many expert resources such as the VSP and the Conservation Districts are available in our communities, these were not consulted either, prior to drafting these rules.

This is unfortunately, an all too familiar top-down approach commonly practiced by our State agencies and a defective process, that creates distrust and resentment against these agencies, from the communities that they are supposed to represent and help.

Ecology has a seat available at the Thurston County VSP Advisory Board, yet they have been absent. The VSP Has accomplished great things and surpassed its expected goals, which help both communities and our environment. It is a waste of tax dollars, staff time and overall effort, not to have included them or the conservation districts in the discussions.

Unfortunately it seems to be that bureaucracies have a tendency to become yet bigger bureaucracies and soon they start losing touch with their communities, the realities of life and sound stewardship practices; which have been working well and sustaining our citizens and our environment, for thousands of years.

Most everyone is opposed to harmful excesses and most of us want to leave a better place for our children. It is almost as if Ecology assumes that we are all bad stewards. Such attitude will never work and it creates discord, stifling any desire to work together towards achieving common goals.

People have the right to feed themselves, farm and raise livestock to do so, without government intervention. Ecology needs to focus on the real offenders and assist all small producers and livestock owners, with help and education to prevent problems

No agency should have the power, to forbid anyone from raising or growing their own food, feed their families and continue being good stewards of the land.

Many of us have worked all our lives to fulfill our dream to do just so and now you're proposing to potentially regulate it out of existence, at your discretion...

Local food is good for our communities, local food is security and local food is natural.

You are loosely using the term CAFO, Which should only be applied to what the acronym states;

concentrated animal feeding operations. The term CAFO or for that matter a Small CAFO, should only be applied to what the acronym stands for; concentrated animal feeding operations!

Your language has lumped the keeping of all animals for any reason (recreation not excluded) and labeled it all as CAFOs in one form or another.

What is concentrated?, How many animals is a concentration?, How large of a lot is a concentration?, how many animals in a lot is it concentration?

These concerns do not even address the other concerns presented by the county Farm Bureau's, the Washington Farm Bureau, the Washington dairy Federation, and others, which have expressed concerns with the overly complex regulations, the far-reaching negative impacts that it would have to small producers and livestock owners, its regulatory complexities, the costs involved with implementing these, the privacy concerns or the surveillance requirements

All these are contained in a document exceeding 100 pages AND again; drafted without reaching out to those it impacts and without reaching out to the hands-on experts with the VSB program and the local conservation districts.

Is this representative of a government by the people and for the people? I'd say not.

Ecology needs to involve the citizens these regulations will directly impact at all levels, work with and enlist the help available through the VSP program and the local conservation districts - then draft new clear language that will achieve the environmental goals, without harming our rural citizens

Sincerely

R. de Leon. August 27, 2022