

## D. Bruce Morgan

Dear Dr. Morris,

I am a member of the VSP Working Group here in Thurston County and a life long conservation farmer. I am an attorney and former president of Thurston County Farm Bureau. In the late 60's and 70's I was fully and personally engaged in the drafting and lobbying efforts which lead to the passage of the Shoreline Management Act and other primary conservation legislation in Washington. I have been raising and breeding all manner of pheasants, parrots, cranes, hawks, wild waterfowl, deer, antelope, and other critters for more than 65 years. I have most certainly had more than my share of frustration with the pace of protection offered our natural resources. However, all that being said, I urge particular caution in drafting and adopting the Small CAFO regulations such as you have proposed.

When we with Farm Bureau lobbied for adoption of the VSP enabling legislation we viewed VSP as a unique opportunity to increase conservation awareness and ultimately more responsible stewardship of our land and natural resources. So far those counties which opted into the program have demonstrated the wisdom of VSP as an alternative to the regulatory model which had been implemented for decades while our resources suffered. Rather than poke sticks in the eyes of our citizens who would embrace VSP through a new Small CAFO overlay I simply would suggest that you categorically exempt all VSP counties from your Small CAFO regulations. If Ecology should encounter a situation where your staff actually can document environmental damage occurring in a VSP county your representative on the local county Working Group should bring the issue to the attention of the Working Group and request assistance in resolving the issue with the practices at issue. I am confident that at least in my county our Working Group would appreciate the opportunity to become part of the solution.

From another perspective, based upon my personal experience with an out of control agency (Wildlife, not Ecology), we learned that our administrative agencies are not held to an honesty standard in expanding their reach into citizens lives. I therefore would urge you to carve out both the VSP exemption and also specific population limits or exemptions which would give our citizens comfort that you would not be intruding into their lives if their livestock populations are small enough as to present no reasonable risk of creating the kind of harm CAFO regulations are intended to prevent. Doing so up front would help put to rest citizens' concerns about potential agency overreach and earn their support for the remainder of your CAFO program.

Finally, I would truly appreciate if you could help ensure that your agency demonstrate its support for VSP by directing that your assigned Working Group representatives actively participate in their assigned Working Group. Perhaps it has been too easily dismissed due to Covid concerns and the advent of zoom as a substitute for real time face to face participation, but I would welcome a much more proactive participation and input from Ecology in our Working Group. I am amazed that Ecology is moving ahead with closing this comment period without so much as offering a presentation to our Working Group regarding these proposed CAFO regulation revisions. Collaboration would seem to serve the conservation community much better than top down regulatory dictates.

Thank you for this opportunity to submit comment.