

ORANGE COUNTY



**FARM
BUREAU**



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February 2, 2022

Duncan McIntosh, Director
EPAA, LLC
6317 Bothwell Road
Tarzana, CA 91335

Dear Mr. McIntosh,

It has been brought to our attention by multiple stable owners and horse owners in Orange County that the state Industrial Permit Rule as written for Concentrated Animal Feeding Operations (CAFO) is being applied vigorously and punitively to stables in our region and is causing significant costs and threatening the continued existence of horse riding and hosting competitions.

Further, we understand that the rule being enforced was written for dairies and other livestock operations which produce and store nutrients in ways that equestrian centers do not. Equestrian centers accumulate a tiny fraction of the nutrients compared to other CAFOs regulated under the same rule and make the industrial permit enforcement efforts against equestrian centers not only excessive but have deprived our community of events and pushed professional equestrian activities to other states.

We support your efforts to educate the policy making members of the State Water Resources Board through data collection, qualified engineering and environmental expertise, and informed modification of rules to protect both the public and equestrians while keeping waters flowing free of any equestrian related impairment.

Thank you for your efforts, and please keep us apprised of your data collection and other results.

Sincerely,

Mark Lopez,
President
Orange County Farm Bureau