Fuere les Mendes

From: Jean Mendoza

Sent: 5/2/2022 3:05:27 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Public Comments



attachments\870B454636E5479A_Dear WA BOH IV.pdf attachments\9EB3F5B649D14565_Dear WA BOH V.pdf attachments\D48883D1438E4717_Dear WA BOH I.pdf

External Email

Hello WA State Board of Health,

Please accept the attached public comments on WAC 246-203-130 from the Friends of Toppenish Creek.

Thank you for reading and taking action to protect public health.

Jean Mendoza



May 2, 2022

Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

Dear WA State BOH,

We are the Friends of Toppenish Creek from Yakima County.

Friends of Toppenish Creek is dedicated to protecting the rights of rural communities and improving oversight of industrial agriculture. FOTC operates under the simple principle that all people deserve clean air, clean water and protection from abuse that results when profit is favored over people. FOTC works through public education, citizen investigations, research, legislation, special events, and direct action.

Regarding the draft rule WAC 246-203-130, please consider this strong objection. As written WAC 246-203-130 allows a CAFO dairy in Washington state to build a million gallon manure lagoon right next to a neighbor's home or well without consequences. Here is an explanation of how the draft rule condones such an assault on human health:

Draft WAC 246-203-130, section 3 says:

- (3) Unless a standard is superseded by a more stringent standard in federal, state, or municipal law, a person must meet the following standards in order to help prevent, control, and abate nuisance and health hazards related to the disposal of domestic animal waste. Except for free-range grazing, livestock trails, trail riding, and other diffuse sources of domestic animal waste, a person must:
 - (d) Handle domestic animal waste from livestock that is <u>collected and stockpiled</u> for later use or disposal as follows:
 - (i) Store the waste to control odors and attraction of flies, rodents, and other vectors;
 - (ii) Store the waste no longer than one year; and

(iii) Site the stockpile:

- (A) One hundred feet or more from a drinking water well;
- (B) Two hundred feet or more from a public drinking water spring;
- (C) Outside the sanitary control area of a public drinking water source if different from the areas set forth in (d)(iii)(A) and (B) of this subsection;
- (D) One hundred feet or more from a surface water body unless:
 - (I) The surface water body is upgradient or is protected by a levee or other physical barrier; or
 - (II) The surface water body is protected by one or more control or treatment practices that capture and prevent leachate. Practices include, but are not limited to, storage pads, covers, storage structures, and filter strips; and
- (E) Outside seasonally or frequently flooded areas unless used or disposed of prior to flooding.

This <u>appears</u> to create strong protections for public health.

But look closer – there is a huge loophole in the proposed rule.

WAC 246-203-130, section 2 (j) says: "Stockpiling" means the temporary piling of domestic animal waste from livestock prior to use or disposal. <u>Stockpiling does not include active composting or lagoon storage of domestic animal waste from livestock.</u>

This more than wrong. This is a gift to the powerful interests that inflict morbidity and mortality on WA citizens by managing manure in ways that place profit above human health.

Unless the BOH can prove that a million gallon manure lagoon next to a family home does not damage the family's health, unless the BOH can prove that tossing manure into the ambient air to compost it does not damage the health of entire neighborhoods, then this loophole must, in all good conscience, be closed.

Sincerely,

Jean Mendoza

Executive Director, Friends of Toppenish Creek

3142 Signal Peak Road

can Mendeza

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May 2, 2022

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People who live near animal feeding operations suffer from pollution of drinking water, air pollution, and infectious disease. State and local officials appear helpless to address this public health issue.

The magnitude of problems related to manure management has increased many fold since the introduction of concentrated animal feeding operations (CAFOs) to animal agriculture. Law makers who wrote rules to minimize health impacts from livery stables could not have envisioned storing animal excreta in million gallon lagoons or tossing it into the air to compost.

Remember that each mature milk cow excretes over 120 lbs of feces and urine every day. Multiply this by thousands of cows and that is a lot of manure.

A possible solution to this serious problem is to authorize citizen lawsuits against polluters when they cause or contribute to human illness or death. There is precedent for holding people responsible when they create conditions that harm others.

By herself, a woman whose husband dies from E-coli 0157 has little hope of winning against a multi-million dollar corporation that flaunts the law. But a change in the rules could make it possible to hold responsible parties accountable, by providing for cost recovery in litigation.

Thank you for seriously considering this option.

Sincerely,

Jean Mendoza

Executive Director, Friends of Toppenish Creek

3142 Signal Peak Road

White Swan, WA 98952

Rationale for Citizen Lawsuits to Protect Public Health from Manure Pollution

Legal Authority:

RCW 43.20.050

Powers and duties of state board of health—Rule making—Delegation of authority— Enforcement of rules.

- (2) In order to protect public health, the state board of health shall:
- (c) Adopt rules and standards for prevention, control, and abatement of health hazards and nuisances related to the disposal of human and animal excreta and animal remains;

WAC 246-203-130

Keeping of animals.

- (1) Any person, firm or corporation is prohibited from keeping or sheltering animals in such a manner that a condition resulting from same shall constitute a nuisance.
- (2) In populous districts, stable manure must be kept in a covered watertight pit or chamber and shall be removed at least once a week during the period from April 1st to October 1st and, during the other months, at intervals sufficiently frequent to maintain a sanitary condition satisfactory to the health officer. Manure on farms or isolated premises other than dairy farms need not be so protected and removed unless ordered by the health officer.
- (3) Manure shall not be allowed to accumulate in any place where it can prejudicially affect any source of drinking water.

Facts:

Human and animal excreta carry pathogens that endanger human and animal health. This is why we teach children to wash their hands after they go to the bathroom.

People who live in close proximity to animal feeding operations suffer from pollution of drinking water, air pollution and infectious disease.

The WA DOH and local health agencies do not monitor pollutants from AFOs, do not surveil for related health impacts, do not investigate complaints or health impacts, do not control discharges and emissions, and do not assist those whose health has been harmed. The WA State Dept. of Ecology and the WA State Dept. of Agriculture do very little, and specifically do not evaluate impacts on human health. It appears that the agencies lack the resources to characterize, assess, and evaluate health impacts from AFOs.

People who live in close proximity to AFOs spend millions of dollars out of pocket to purchase safe drinking water, address health impacts such as asthma, cardiovascular and lung disease, and infections.

Taxpayers spend millions of dollars to subsidize AFO actions to reduce and mitigate pollution, and to keep AFOs in business.

Cost benefit analysis of the proposed WAC 246-203-130 does not address costs to citizens, only costs to business.

Meeting legal standards to prove health hazards is expensive. In reality, a citizen who suffers illness or even death due to sloppy manure management does not have the financial resources to prove a cause and effect relationship. Public health agencies rarely make these connections.

Current WA rules and regulations do not protect citizens from the adverse health impacts of air and water pollution from improper manure management.

Proposed change to the Draft WAC 246-203-130:

One solution to this problem is provision for citizen lawsuits against those who damage public health. Such lawsuits could be allowed by provisions similar to those in the Clean Water Act. Citizens could seek injunctive relief (court orders prohibiting the pollution from continuing), civil penalties, and reimbursement of legal costs and attorneys' fees.

Proposed addition to WAC 246-203-130:

Any citizen may commence a civil action on his own behalf or on behalf of dependents:

- 1. Against any person, or collective of persons, who are alleged to discharge pollutants into a drinking water aquifer, or the ambient air in amounts that inflict illness or death.
- 2. Against responsible officials for failure to perform an act or duty to investigate negative health impacts from airborne or waterborne pollutants from animal manure.

The court, in issuing any final order in any action brought pursuant to this section, may award costs of litigation (including reasonable attorney and expert witness fees) to any prevailing or substantially prevailing party, whenever the court determines such award is appropriate.

Arguments:

People who live near animal feeding operations where large amounts of manure are (mis)managed suffer documented adverse health impacts, but state and local officials appear helpless to change this situation. Citizen lawsuits could play a role in providing relief. Citizen lawsuits could realistically be undertaken if attorneys and expert witnesses could reasonably expect payment for their services.

Criteria for proving adverse health impacts will undoubtedly be subject to intense debate, but this obstacle is not insurmountable.



May 2, 2022

Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

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We appreciate your hard work on WAC 246-203-130, especially the comprehensive paper, "Keeping of Animals". The documentation of health impacts deserves close attention.

- 1. In 2013 Davis et al found higher rates of campylobacteriosis in Whatcom and Yakima Counties, the WA counties with the highest concentrations of dairies and dairy animals.* Please add this research to your literature review.
- 2. Unfortunately, the document "Keeping of Animals" is no longer up to date. Since 2018:
 - a) The WA Legislature has approved the HEAL Act and the Climate Commitment Act.
 - b) Staff at the WA State Dept. of Agriculture have discounted the value of Tech Note 23 assessments for manure lagoons.
 - c) Ecology has not completed a plan for nonpoint source pollution as promised.
 - d) There is even more data that documents egregious pollution of WA aquifers by concentrated animal feeding operations (CAFOs).
 - e) The Yakima Regional Clean Air Agency (YRCAA) has rescinded their Air Quality Management Policy for Dairies.

- f) People who live in areas with high levels of fine particulate matter from CAFO emissions have suffered higher than average rates of morbidity and mortality from COVID 19.
- g) The WA State Court of Appeals ruled that the WA Pollution Control Hearings Board erred. Ecology's 2017 National Pollutant Discharge Elimination System (NPDES) permit does not protect waters of WA State.

Below is a more thorough analysis of "Keeping of Animals" that explains the need for updates, followed by a critique of BOH's Cost Benefit Analyses.

- 3. RCW 43.20.050 (c) states, "the State Board of Health shall . . . adopt rules and standards for prevention, control, and abatement of health hazards and nuisances related to the disposal of human and animal excreta and animal remains". We find no authority to delegate this duty to either the WA State Dept. of Agriculture or the WA State Dept. of Ecology. In fact, neither of these agencies are qualified to address human health.
- 4. RCW 34.05.310 addresses negotiated rule making. We are not sure whether the actions leading up to this draft rule constitute negotiated rule making or not. We do know that the BOH convened two stakeholder meetings in 2019 to discuss the rule. There were more advocates just for the dairy industry than advocates for the citizens. The beef industry brought their lobbyists as well. Only FOTC argued for protection of CAFO neighbors. Everyone at the table was Caucasian.

If this is negotiated rule making, there are insufficient protections to ensure that other agencies will do their part to protect public health. Currently Ecology and WSDA have the power to control air and water pollution, but they do not use that power, so air and water pollution from dairies continue. There are no memoranda of understanding to guarantee cooperation and collaboration.

Sincerely, Jean Mendeza

Jean Mendoza

Executive Director, Friends of Toppenish Creek

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^{*} Davis, M. A., Moore, D. L., Baker, K. N., French, N. P., Patnode, M., Hensley, J., ... & Besser, T. E. (2013). Risk factors for campylobacteriosis in two Washington state counties with high numbers of dairy farms. *Journal of clinical microbiology*, *51*(12), 3921-3927. Available at https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3838072/

KEEPING OF ANIMALS Background and Policy Recommendations of the Washington State Board of Health for Revising WAC 246-203-130

https://sboh.wa.gov/sites/default/files/2022-01/KeepingOfAnimals-FinalReport.pdf

Pages 4 & 15:

Regulation of livestock manure, commercial animal feeding operations, and other domestic animal waste in Washington to protect water and air quality is framed mainly around the following:

- Dairy licensing
- National Pollutant Discharge Permits
- Nonpoint source pollution prevention
- Local ordinances
- Air quality control by Ecology and local air agencies

Response:

WA dairies are required to have nutrient management plans, but they are not required to follow them. See "Keeping of Animals" page 15 that says, "The law does not require producers to follow the (nutrient management) plans."

Dairies are only inspected every 18 - 22 months and the inspections focus on what is written on paper, not on what is happening on the dairy. There is only one WSDA inspector for all Eastern Washington where 2/3 of WA milk cows are housed.

Less than 10% of WA dairies have NPDES permits. Permitted dairies in Yakima County apply manure in quantities that greatly exceed agronomic rates.¹

Ecology has yet to complete a nonpoint source pollution plan for the state. Ecology has worked on nonpoint source pollution since 2015 and is nowhere completion.³

Local ordinances are almost non-existent and are not enforced by local agencies, at least not in Yakima County.⁴

¹ Reports available on the Ecology PARIS website at https://apps.ecology.wa.gov/paris/PermitLookup.aspx

² See Attachment 1

³ Ecology Voluntary Water Guidance for Agriculture at https://ecology.wa.gov/About-us/Accountability-transparency/Partnerships-committees/Voluntary-Clean-Water-Guidance-for-Agriculture-Adv

⁴ See Attachment 2 – Email from the Yakima Health District re enforcement of Solid Waste Manure Composting rules

The Yakima Regional Clean Air Agency (YRCAA) rescinded an Air Quality Management Policy for Dairies in 2019. The YRCAA does not investigate air quality complaints against dairies and has never issued a notice of violation of odor or dust.⁵ Washington CAFOs do not report hazardous air emissions.

The summary in "Keeping of Animals" gives the impression that other WA agencies address pollution from WA CAFO dairies. This is incorrect.⁶

Page 10:

Attachment 3.

The Lower Yakima Valley is similarly plagued by high nitrate levels in drinking water that are closely associated with significant numbers of farm animals and large animal feeding operations. Yakima County has the most dairy cows in the state (WSDA, 2011). About a third of the Lower Yakima Valley uses private, unregulated wells for drinking water. Between 10 and 20% of these wells have nitrate concentrations that exceed the national and state drinking water standard (USEPA, 2012b).

In 2018-2019 the Lower Yakima Valley Groundwater Management Area drilled 30 monitoring wells evenly spaced throughout the Lower Yakima Valley (LYV). At the time of drilling 45% of the wells had nitrate levels above 10 mg/L. Beginning in 2021 Ecology began sampling the monitoring wells to establish a baseline for the area. In the first two 2021 samplings 45% of the samples were above 10 mg/L.^{7, 8}

The EPA has studied nitrate levels in dedicated monitoring wells on a cluster of LYV dairies. The highest reading in the EPA studies is 234 mg/L.⁹

⁶ Ecology and WSDA knew about pollution on a cluster of Lower Yakima Valley dairies for years, but gave the dairies glowing reports while the dairies applied manure to cropland at up to seven times agronomic rates. See

⁵ Arguments for Dissolving the Yakima Regional Clean Air Agency at http://www.friendsoftoppenishcreek.org/cabinet/data/FOTC%20Arguments%20for%20Dissolving%20the%20YRC

AA.pdf

⁷ LYV GWMA Initial Ambient Groundwater Monitoring Well Report at https://www.yakimacounty.us/DocumentCenter/View/21633/GWAC-Presentation---Monitoring-Well-Report-Overview---2019620-v20-1

⁸ WA Ecology Environmental Information Management System Data Base Groundwater Data at https://apps.ecology.wa.gov/eim/search/Groundwater/GWSearch.aspx?SearchType=Groundwater&State=newsearch &Section=all

⁹ EPA Region X LYV Groundwater Fact Sheet 2014 Yakima Dairies Consent Order Update at https://www.epa.gov/sites/default/files/2017-12/documents/lower-yakima-valley-groundwater-fact-sheet-december-2014.pdf

Page 15:

WSDA has conducted lagoon inspections in the Yakima Valley based on the site inventory and assessment procedure of Natural Resources Conservation Service (NRCS) Tech Note 23. Between 2015 and 2017, WSDA inspected most dairy lagoons in the Yakima Valley with a minimum of two site visits, to evaluate the lagoons when full and when empty. The lagoons are scored on criteria (e.g., soil type, aquifer susceptibility, proximity to water bodies, compliance with design standards) and ranked on a risk probability matrix for site risk and seepage/structure risk. The evaluations are being carried out in concert with the CAFO permit, giving facilities with high risks two years to develop and implement plans to address the deficiencies.

WSDA now says that the Tech Note 23 Inspections re invalid. WSDA has not completed Tech Note 23 Inspections outside Yakima County as promised. Tech Note 23 Inspections in Yakima County are missing essential data and those dairies with high risk lagoons have not developed and implemented plans to address the deficiencies as stated in "Keeping of Animals" 10

Page 16:

Any commercial or industrial operation that discharges waste material to state waters is required to have a permit from Ecology.

This is simply not true. Two dairies in the LYV dairy cluster that have well documented discharges are not covered by NPDES permits.¹¹

Discharges are allowed in limited situations and cannot violate water quality standards or impair other uses of the waters.

Many dairies in Whatcom County are located in flood plains. Manure from these dairies flowed into the floodwaters of the Nooksack River in 2021. Taxpayers spent hundreds of thousands of dollars to help Whatcom County dairies pump manure from lagoons that were at risk of overtopping during the 2021 floods.¹²

¹⁰ See Ecology and WSDA Do Not Inspect Manure Lagoons at http://www.friendsoftoppenishcreek.org/issues/water.html

¹¹ The EPA has found egregious pollution from crop land and from unlined manure lagoons on the Henry Bosma Dairy and the Liberty Dairy in the LYV dairy cluster. Neither of these dairies has an NPDES permit.

¹² Verbal communication from Laura Watson, Director of the WA Dept. of Ecology at the April meeting of Ecology's Ag and Water Quality Advisory Committee.

Decision on CAFO Permit Appeal On October 25, 2018, the Washington State Pollution Control Hearings Board (PCHB) issued an order on an appeal of the CAFO permits by a number of organizations on all sides of the issue. The order upheld and affirmed the permits with the exception of a condition associated with lagoon assessments. Ecology is expected to reissue the permits consistent with the order (WSPCHB, 2018).

A coalition of environmental groups successfully appealed the PCHB decision to the WA State Court of Appeals. In 2021 the Court of Appeals ruled that the 2017 NPDES permits for CAFOs do not protect waters of the state. ¹³

Ecology and WSDA jointly administer CAFO permits and also work cooperatively on the Dairy Nutrient Management Program and Agricultural Nonpoint Source Program. The agencies are guided by a Memorandum of Understanding (MOU) that was last updated in 2011.

The referenced MOU protects WA dairies from enforcement of the Clean Water Act. The WSDA Dairy Nutrient Management Program (DNMP) hardly ever documents a discharge to waters of the state. Consequently, there is no justification for requiring a dairy to obtain an NPDES permit. The DNMP typically states that a dairy complies with best management practices (BMPs) although WSDA and Ecology state that there is no approved list of BMPS for dairies.¹⁴

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Ecology is currently undertaking a major project to develop voluntary clean water guidance for agricultural activities. The project aims to identify agricultural practices that are most effective in addressing nonpoint source impacts and achieving compliance with water quality standards. Impetus for the project is federal law, specifically the Clean Water Act and Coastal Zone Act Reauthorization Amendments of 1990, which require the agency to identify suites of practices for different sources of nonpoint pollution. The project is part of Ecology's 2015 Nonpoint Source Pollution Plan. The planning, stakeholder involvement, and technical analysis are expected to take a couple years (WSDOE, 2015b, 2015c, 2017).

After at least seven years Ecology's nonpoint source plan is nowhere near completion.³

¹³ Puget Soundkeeper et al v. WA Ecology 2021, available at http://www.friendsoftoppenishcreek.org/cabinet/data/D2%2052952-1-II%20PUBLISHED%20OPINION%20(2).pdf

¹⁴ WSDA & Ecology Memorandum of Understanding – A Chain of Errors, available at http://www.friendsoftoppenishcreek.org/cabinet/data/MOU%20Problems%20and%20Sequelae.pdf

Page 20:

RCW 7.48.305 explains that agricultural activities that are consistent with good practices and that conform with all applicable laws and rules are assumed to be reasonable and do not constitute nuisance unless the activity has a substantial adverse effect on public health and safety.

In Yakima County officials have never investigated the adverse public health effects of agricultural activities such as:

- Polluting groundwater
- Polluting surface waters and contaminating fish
- Polluting the air with particulate matter, ammonia, hydrogen sulfide, volatile organic compounds, ozone, methane, and nitrous oxide. ⁵

Because there are no documented impacts officials refuse to take actions against allegedly "good agricultural practices" such as:

- Composting hundreds of dead cows in small areas
- Composting manure in the pens where cows live
- Discharging pollutants into aquifers that people access for drinking water.⁵

Morbidity and mortality from COVID 19 are well above the state average in Yakima County. Harvard University has documented a relationship between counties with high levels of particulate matter and deaths from COVID 19.¹⁵

Chapter 35.88 RCW applies to protection of public water supplies and explains that animal operations such as hog pens and feed yards that pollute municipal water supplies, storage, or conveyance are illegal and should be abated as nuisance.

The Outlook Elementary School in Yakima County had to drill two new wells due to nitrate contamination. The only likely source of this pollution is nearby dairies with well documented discharge to groundwater. Officials took no actions against the dairies but simply expected taxpayers to cover the expense of drilling new wells.

The City of Mabton has been forced to drill several new municipal wells due to a falling aquifer and nitrate contamination that reached 20 mg/L. Officials took no actions against upgradient dairies but simply expected taxpayers to cover the expense of drilling new wells.

⁵ Arguments for Dissolving the Yakima Regional Clean Air Agency at http://www.friendsoftoppenishcreek.org/cabinet/data/FOTC%20Arguments%20for%20Dissolving%20the%20YRC AA.pdf

¹⁵ COVID 19 Incidence and Death Rates for Yakima County, available at http://www.friendsoftoppenishcreek.org/cabinet/data/COVID%2019%20Demographics%20for%20Yakima%20County%20IV.pdf

RCW 70.54.010 and RCW 90.48.080 respectively make it illegal to deposit anything deleterious that affects public water supplies or to discharge polluting matter to waters of the state.

Dairy discharges to waters of the state are well documented, yet Ecology does nothing to stop this illegal activity.

Chapter 70.95 RCW sets requirements for solid waste management, which extends to animal waste and includes provisions that prohibit dumping or depositing waste in waters of the state or creating a nuisance. Companion solid waste handling standards, chapter 173-350 WAC, exempt land application of manure if applied at agronomic rates. If piled, over-applied, or otherwise mismanaged to create a problem, manure can be regulated as a solid waste.

Over application of manure to cropland is well documented, yet WSDA and Ecology do nothing to stop this illegal activity. ^{1, 2, 6, 9}

Page 21:

King County first adopted its livestock management ordinance in the mid1990s. The purpose of KCC 21A.30, sections 040 – 075, is to support the raising and keeping of livestock and to minimize impacts on water quality and salmon habitat. The code also regulates small animals. The code regulates lot size, livestock densities, farm planning, and management practices to prevent nonpoint pollution. The management standards include many requirements for manure storage and spreading. Section 122 of KCC 21A.12 complements this with a manure storage setback of 35 feet from the property line. Commercial dairies are exempt and must meet the requirements of DNMP (King County, 2009, 2013).

The Keller Dairy in King County, located next to the Snoqualmie River, spreads manure within 10 feet of the river, according to their manure pollution prevention plan (MPPP).

¹ Reports available on the Ecology PARIS website at https://apps.ecology.wa.gov/paris/PermitLookup.aspx

² See Attachment 1

⁶ Ecology and WSDA knew about pollution on a cluster of Lower Yakima Valley dairies for years, but gave the dairies glowing reports while the dairies applied manure to cropland at up to seven times agronomic rates. See Attachment 3.

⁹ EPA Region X LYV Groundwater Fact Sheet 2014 Yakima Dairies Consent Order Update at https://www.epa.gov/sites/default/files/2017-12/documents/lower-yakima-valley-groundwater-fact-sheet-december-2014.pdf

See the Keller Manure Pollution Prevention Plan, page 11/22 that says:

In addition to using the MSA and ARM tools year-round, the appropriate seasonal setback distance will be utilized when applying manure. These seasonal setbacks are based on scientific studies which recommend specific distances for sediment and nutrient removal based on seasonal precipitation, soil saturation conditions, and surface runoff potential. This includes a more robust setback during the high risk months of October 1-February 28 of 100 feet, reduced to 40 feet from March 1-May 31 and September 1-September 30 when soils are drying, and 10 feet in the dry summer months of June 1-August 31 when precipitation is minimal and soils dry. The following table lists the appropriate setback distances per season. 16

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Registration and Reporting: Feedlots with 1,000 or more cattle in operation between June 1 and October 1 are required to register with Ecology or their local air agency under WAC 173-400-099 to WAC 173-400-104, report emissions of certain criteria and toxic air pollutants, and undergo inspections every one to three years. Emissions are estimated based on the size, processes, and pollution controls of the animal feeding operation. Ecology recently conducted a comprehensive literature review and issued revised emissions factors for cattle feedlots in 2016.

Are dairies classified as feedlots? None of the 50 CAFO dairies in Yakima County register as sources of air pollution, or report emissions of air pollutants. There are about 100,000 milk cows in a 273 square mile area in the Lower Yakima Valley (LYV).

Controlling Fugitive Emissions, Dust, and Odor: Under RCW 70.94.640, odors or fugitive dust from animal feeding operations that are applying BMPs¹⁷ are exempt from the requirements of the state Clean Air Act unless they have a substantial adverse effect on public health. Feedlots with 1,000 or more cattle are included in this agricultural activity exemption except they must:

- Follow BMPs¹⁷ and develop and implement a fugitive dust control plan;
- Comply with the State Implementation Plan (SIP) for air quality; and
- Additional controls may be required as part of the SIP if an area is designated as nonattainment for particulate matter under national ambient air quality standards (NAAQS).

¹⁶ Manure Pollution Prevention Plan (MPPP) Keller Dairy, page 11/22, available at file:///C:/Users/Jean%20Mendoza/Downloads/2020-07-28%20MPPP%20(5).pdf

¹⁷ According to WA Ecology there are no approved best management practices for WA dairies. See Attachment 4.

Ecology or the appropriate local air agency review and approve fugitive dust control plans, inspect sources, respond to complaints, provide compliance assistance, and may issue enforcement actions. In 1995, Ecology issued guidelines on fugitive dust control for beef cattle feedlots and best management practices. These guidelines are included in the SIP to help the state meet and maintain the NAAQS and protect public health. Yakima Regional Clean Air Agency has also established policies and BMPs for animal feeding operations in their jurisdiction, specifically for dairy operations, confined heifer replacement feeding operations, and confined beef cattle feeding operations. As an added note, Ecology is working to interpret and implement changes to RCW 70.94.640 made in the 2017 legislative session by SSB 5196 (C 217, L 17) that extend the Clean Air Act exemption for odor and fugitive dust caused by agricultural activities to cattle feedlots. This will change aspects of the regulatory structure when finalized.

Washington law requires Ecology to approve a list of best management practices for CAFOs. Friends of Toppenish Creek submitted public records requests for a listing of these BMPS in 2021. Both Ecology and WSDA replied that there are none.¹⁷

The Yakima Regional Clean Air Agency rescinded their policy for dairies in 2019. The YRCAA does not investigate complaints regarding odor and dust from dairies.⁵

Page 25:

Capitalize on Local Health Authority The rule should capitalize on the authority and responsibility of local health boards and local health officers under chapter 70.05 RCW. This includes authority to:

- Supervise the maintenance of all health and sanitary measures;
- Enact and enforce local regulations as needed to preserve, promote, and improve public health; and
- Provide for the prevention, control, and abatement of nuisances detrimental to public health.

In response to a 2021 public records request the Yakima Health District informed FOTC that the YHD does not enforce WAC 173-350-220 with respect to manure composting facilities.

⁵ Arguments for Dissolving the Yakima Regional Clean Air Agency at http://www.friendsoftoppenishcreek.org/cabinet/data/FOTC%20Arguments%20for%20Dissolving%20the%20YRC <a href="http://www.friendsoftoppenishcreek.org/cabinet/data/FOTC%20Arguments%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20for%20for%20for%20for%20for%20Dissolving%20for%2

⁴ See Attachment 2 – Email from the Yakima Health District re enforcement of Solid Waste Manure Composting rules

Leave Regulation of Large Animal Feeding Operations to Established Programs WSDA manages the Dairy Nutrient Management Program and Ecology and WSDA comanage the CAFO permit. For many reasons, the programs are complicated and hard to implement. Despite the challenges, the two agencies are best positioned to regulate the state's large commercial animal feeding operations given their legal authorities, expertise, resources, and support from many partner agencies. The same holds true for regulation of air emissions by Ecology and the local air agencies. In keeping with the preceding recommendations, the Board's rule should avoid duplicating core work of these programs and should aim to support these existing state programs with complementary authority and functions.

We have shown that Ecology and WSDA have failed to protect the environment from water and air pollution related to CAFO dairies. These agencies barely talk about human health. Leaving implementation of public health to Ecology and WSDA is a recipe for failure.

Small Business Economic Impact Statement WAC 246-203-130 a Rule Concerning Keeping of Animals

Page 4:

NAICS Code 1121, Description "Cattle Ranching and Farming", # of businesses in WA "534", MCT (1% average annual payroll) "\$3,657.58", MCT (0.03% annual receipts) "\$3,864.14"

We believe the cost estimates in this category that includes the multi-million dollar dairy industry, are inaccurate. We do not believe that the payroll for veterinary services exceeds the payroll for dairies as stated in the Economic Impact Statement.

Significant Legislative Rule Analysis WAC 246-203-130 a Rule Concerning Keeping of Animals Revising the Section Title to Domestic Animal Waste

Page 16:

WAC 246-203-130(3)(d)(iii)(D)(II) Site stockpiled livestock waste one hundred feet or more from a surface water body unless the surface water body is protected by one or more control or treatment practices that capture and prevent leachate and runoff.

Description: If waste from livestock is stockpiled for later use or disposal, this proposed exception to WAC 246-203-130(3)(d)(iii)(D) allows people to site stockpiles closer than one hundred feet of a surface water body if practices are applied to mitigate runoff and leachate. This can include practices to mitigate stockpiles such as covers and pads, or alternate methods of storing stackable waste, such as stacking and composting structures.

Common conservation practices for stackable waste include the following, listed by NRCS code. Practices can be applied individually or in combination. Practices may or may not be designed and constructed to NRCS standards but should always be designed to account for anticipated storage needs, surface loads, drainage, and possible seepage.

This section fails to inform the reader that the definition of "stockpiling" in the draft WAC 246-203-130 exempts manure composting and manure lagoons from the definition. In Yakima County there are over 500 acres of manure compost on bare ground. In Yakima County there are over 200 acres of manure lagoons, and most are simply "clay lined" which means they are lined with compacted soil. Leaching from these lagoons is significant and well documented.

WAC 246-203-130 does not sufficiently address groundwater pollution or air pollution.

NRCS standards are guidelines and non-enforceable.

¹⁸Lower Yakima Valley Groundwater Management Area Nitrogen Availability Assessment at https://www.yakimacounty.us/2131/Nitrogen-Availability-Assessment

¹⁹ Bosma Dairy Lagoon 3 shows massive nitrogen loadings leading to ground water contamination, available at http://charlietebbutt.com/files/CAFOs/Bosma%20Lagoon%203%20Abandonment%20Plan_20220118.pdf

Attachment 1: Reports available on the Ecology PARIS website at https://apps.ecology.wa.gov/paris/PermitLookup.aspx

Annual NPDES reports from DBD Dairy 2018 to 2021

Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions Based Upon Trends	Comments				
Low	24	10							
	Old Mint	3							
all Soil Test Nitrate Range:			None	None	Canal break resulted in no water for 1.5 weeks, resulting				
Less than 15 ppm			1		in loss of yield.				
Less than 55 lbs/acre					D. A. C.				
8.6. 10	018	17		Man bases of the	IN MASS ASSESSMENT OF THE REAL PROPERTY.				
Medium	02EC	18							
all Sail Tact Nitrata Dange.	02:10 02:10 03:1			¥¥438077	Canal break resulted in no water for 1.5 weeks, resulting				
			Continue with agronomic rate	None	in loss of yield.				
• 55-110 lbs/acre									
23-110 i0s/acre		1	l .						
	02EB	45							
High 07 45		3' samples to be taken							
	oil Test Mitrate Range: 08-11C 46	-	next fall.						
		42	Hextrail.	None	Canal break resulted in no water for 1.5 weeks, resulting				
• 31-45 ppm	22CP	39	Re-evaluate agronomic rate.	Hone	in loss of yield.				
• 111-165 lbs/acre	23	36			Ø				
	Charles and								
/ei/ High	01C	117							
	02NWB	65							
all Soil Yest Militate Range	02SWB	52	3' samples to be taken	d and a second					
 Mose Haan 45 ppm 	02WC	67	next fall.						
 Wore their 165 	03B	161	87723 APRIL 2		Canal break resulted in no water for 1.5 weeks, resulting				
	03C	140	Reduce application		in loss of yield.				
	04	64	(evaluate agronomic	None at this time					
	05	65	rate).	0.141-1538000000000000000000000000000000000000	Some fields have produced residual ppm levels that are				
	06	54	3888967		well above what would typically be expected given the				
	2255	63	Get approval of nutrient		applied manure rates.				
	25	48	budget from DOE.						

DBD WASHINGTON, LLC		100					
Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions based upon Trends	Comments		
Low Fall Soil Test Nitrate Range Less than 15 ppm Less than 55 lbs/acre	Old Mint	1.7	None.				
Medium	01 C	20.2	C				
all Soil Test Nitrate Range	08-11 C	30.3	Continue with agronomic				
15-30 ppm	22 SS	18.8 21.9	rate.				
• 55-110 lbs/acre	25	19.3					
- 33-110 ibs/acre	23	19.3					
High	02 EC	38.3	Adjust application timing.	None at this time			
Fall Soil Test Nitrate Range	04	40.5	3' fall soil sampling.	Hone of this time			
• 31-45 ppm	06	40.1	Adjust application rates				
• 111-165 lbs/acre	07	39.6	rajust application rates				
	23	32.3	, -				
	24	38.8					
	01 B	62.3	Adjust application timing.	None at this time	Emergency applications in 2019 are the main		
	02 EB	67.5	3' fall soil sampling.		reason for the higher residual nitrate levels		
 Mismathan 95 ppm. 	02 NWB	94.1	Reduce application rate				
More than \$66 for acro	200.000	48.5					
	02 WC	56.6	Get DOE approval for				
	03 B	132.7	nutrient budgets.				
	03 C	143.5					
	05	47.7					
	08-11 B	53.4					
	21	50.4					
	22 CP	50.2					

Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions Based Upon Trends	Comments
Low	23	14.3			
Fall Soil Test Nitrate Range: • Less than 15 ppm	25	8.0			
Less than 55 lbs/acre	Old Mint	5.5			
Medium	06	28.9			
Fall Soil Test Nitrate Range:	07	24.2			
 15-30 ppm 55-110 lbs/acre 	22 SS	16.6			
	24	29.0			
High		1			
	01 C	43.9			
all Soil Test Nitrate Range:	02 EC	41.2	The nutrient budgets will be		
31-45 ppm 111-165 lbs/acre	02 SWB	33.5	adjusted downward		
TAX ADDIDGUCE	05	40.8			
The same of	01 B	50.7			
Very High	02 EB	65.1			
Fall Soil Test Nitrate Range:	02 NWB	50.0	1		
More than 45 ppm	02 WC	54.7	1		
More than 165 lbs/acre	03 B	164.9	The following fields will receive limited to no		
	03 C	193.3	application until the values		
	04	48.2	come down. Values are down		
	08-11 B	95.5	from 2019.		
	08-11 C	126.5			
	21	66.1			
	22 CP	62.5			

Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions Based Upon Trends	Comments
Low	Field 07	11.0	None		
Fall Soil Test Nitrate Range:	Field 22 SS	5.1		1	
Less than 15 ppm	Field 25	5.3			
Less than 55 lbs/acre	Old Mint	12.6			
Medium					
Fall Soil Test Nitrate Range:	Field 02 EC	15.5	None		
• 15-30 ppm	Field 05 Field 06	25.3 16.9			
 55-110 lbs/acre 	Field 08-11 C	23.0			
	Field 23	25.3			-
	Theid 23	25.5			
High	Field 01 B	41.0	No application for 2022		3)
	Field 01 C	36.6	Reduced application	ji	
Fall Soil Test Nitrate Range: • 31-45 ppm	Field 02 EB	33.0	No application for 2022	ĵ.	
• 111-165 lbs/acre	Field 02 WC	44.8	No application for 2022		
	Field 24	43.5	Reduced application		
/ery High	Field 02 NWB	71.7	No application for 2022	1	Fields in the High to Very High risk levels continue to
real Action	Field 02 SWB	45.5	No application for 2022		decrease as in 2019 there were 17 total fields in these
Fall Soil Test Nitrate Range:	Field 03 B	106.0	No application for 2022		categories and in 2020 there were 15 and now in 2021
 45 ppm More than 165 	Field 03 C	214.7	No application for 2022		there are 13.
lbs/acre		10000000		4	there are 15.
	Field 04	56.0	No application for 2022		
	Field 08-11 B	69.8	No application for 2022		
	Field 21	54.6	No application for 2022		
	Field 22 CP	52.9	No application for 2022		

Annual NPDES reports from Sunnyside Dairy 2019 to 2021

Sunnyside Dairy					
Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions based upon Trends	Comments
Low	70 ac Pivot 02 Karl's	5.3	None.	No trends have been	7
Fall Soil Test Nitrate Range	Airport 02	9.1		established.	
Less than 15 ppm Less than 55 lbs/acre	Airport 03	4.8			
	P01	13.7			
	P02	12.6	8		
	P03	3.1			
the state of the state of the state of	Tom 03 70 ac	5.5			
Medium	70 ac Pivot 01 Karl's	23.6	None.	No trends have been	
Fall Soil Test Nitrate Range	70 ac Pivot 03 Karl's	22.7	8	established.	
• 15-30 ppm	Airport 01	25.0	N .		
 55-110 lbs/acre 	Case	21.1			
	Field 01	18.9		l'	
	Field 02	17.7			
	Field 03 CP	25.6			
	P05	18.0			
	Tom 01	28.4			
	Tom 02	30.7			
High	Field 04	38.9	Adjust application timing.	No trends have been	
Fall Soil Test Nitrate Range	Little Dairy E	35.7	3' fall soil sampling.	established.	
• 31-45 ppm	Little Dairy N	32.3	Document reasons for	established.	
 111-165 lbs/acre 	PO4	36.9	higher residual.		
	Wade's 02	33.5	manual residuals		
Veirveilete	60 ac	125.8	Adjust application timing.	No trends have been	
	100 ac	62.7	3' fall soil sampling.	established.	
a Auto-thum 45 park	Field 03 Linear	51.3	Document reasons for		
Whose than 255 lbs / Auto-	Field 05	66.4	higher residual.		
	Guerra	80.4	Get DOE approval for		
	Little Dairy W	62.2	nutrient budgets.		
	Orchard	65.3			
	Rick	88.3			
	Wade's 01	48.9			
	Wade's 03	181.6			

Sunnyside Dairy					
Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions based upon Trends	Comments
Low	70 ac Pivot 02 Karl's	4	/		
Fall Soil Test Nitrate Range	Airport 01	3			
Less than 15 ppm Less than 55 lbs/acre	Airport 03	4			
	MILESTER VINCE				
Medium	60 ac	24.6			
all Soil Test Nitrate Range	100 ac	29.8			
 15-30 ppm 	Airport 02	15			
 55-110 lbs/acre 	Field 01	22			
	Field 02	24			
	Field 03 CP	16			
	Little Dairy N	17			
	Little Dairy W	26.1			
	P05	30			
	Tom 03 70 ac	15			
	Wade's 01	22.5			
	Wade's 02	22			
High	Case's	100	MEN MEN COLLEGE	No. 351 - 102 - 14	
riign Fall Soil Test Nitrate Range		31	Nutrient budgets will be		
31-45 ppm	Field 04	37	adjusted downward		
	Little Dairy E	34			
 111-165 lbs/acre 	P01	15			
	P02	20			l .
	P03	44			
	Rick's	35.5		1	
	Tom 01 N	38		1	1
/ery High:	70 ac Pivot 01 Karl's	60	Nutrient budgets will be		
all Soil Test Altrate Range	70 ac Pivot 03 Karl's	52	adjusted downward.		
More than 45 ppm	Field 03 Linear	56	Some fields will not		
 More than 165 lbs/acre 	Field 05	48	receive nutrient.		
	Guerra	53.6			
	Orchard	70			1
	P04	59			
	Tom 02 W	66			
	Wade's 03	92.9			

Sunnyside Dairy	20	A22	0	120	39
Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions based upon Trends	Comments
Low	60 ac	7.9	None		*
Fall Soil Test Nitrate Range	70 Pivot 01 Kari's	8.6	30.71.22.67	1	
 Less than 15 ppm 	100 ac	10.3		1	
 Less than 55 lbs/acre 	70 ac Pivot 01 Karl's	8.6	ŝ	1	
	70 ac Pivot 02 Karl's	8.0		1	
	Field 01	9.0	6	1	
	Orchard	13.4		1	
	Tom 01 N	11.8		1	
	Case's	12.3			
	Tom 03 70 ac	5.6			
	Airport 01	3.4			
	Airport 03	7.5			
Medium	Wade's 02	15.4	None		
Fall Soil Test Nitrate Range	70 ac Pivot 03 Kari's	19.2		1	
 15-30 ppm 	Field 02	22.5	8	1	
• 55-110 lbs/acre	Field 03 CP	23.7	[[1	
	Rick's	15.7	ß.	1	
	Tom 02 W	19.3		1	
	Field 05	28.5		1	
	Guerra	17.6		1	
	Little Dairy E	16.0		1	
	Little Dairy N	20.1		1	
	Little Dairy W	24.6		1	
	P 01	23.3			
	P 02	28.2	1		
	P 03	21.9	1		
	P 05	21.9	į.		
High	Field 03 Linear	38.4	Reduce application	Watch Field 03 Linear	
Fall Soil Test Nitrate Range	Field 04	31.8		and Field 04 as two	
 31-45 ppm 	Wade's 01	39.4	1	years in High or Very	
• 111-165 lbs/acre				High	
Very High	Wade's 03	54.8	Reduce application	Watch P04 and Wade's	
More than 45 park	Airport 02	49.4		03 as two years in High or Very High	
More than 165 Bis/acre	P.04	58.3	1	C. very right	

Attachment 2:

Email from Shawn Magee at the Yakima Health District, October 20, 2021:

Follow-Up Info for Public Records Request Email 1 of 2

Good Afternoon Ms. Mendoza,

Below is a the response to the question you asked in a follow-up email for the records request you submitted. Also, attached are the records we have for your follow-up request.

Please note that many facilities, including exempt composters, are supposed to submit a notice of intent – many have not. Also, many facilities, including exempt composters, are supposed to submit an annual report – many have not. These records are from 2010–present.

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Shawn Magee, R.S.

Environmental Health Director

Yakima Health District

Office: (509) 249-6533



Attachment 3: Soil Nitrate Reports from George DeRuyter & Son Dairy



MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0600 7570

Field: GDS-SU-02

Acres:

Sample Date: 10/17/2013

Crop: Triticale-Sudan

Irrigation: Wheel line

Previous Crop: 2013 Alfalfa

Current Crop: 2014 Triticale Sudan

Soil series:

Scoon silt loam

99.1

No. of Sites:

30

Leach Hazard: Low

Topography:

Gently undulating

Totals:

Avg Sampling Depth:

Restrictive layer?

Y Where? Gravel on the surface, caliche layer.

weeds. Whitish soil color on the knolls and ridges.

Residue Incorp?

N Type? Alfalfa cultivated, Triticale-Sudan planted.

37

Comments: Sampled a three foot field composite. At sampling the Triticale was at 2-4" tall. Volunteer alfalfa, corn, and

Mobile Nutrients (lbs/ac) Exch. / Soluble Bases (meq/100g) Other Data ppm CEC VolWt Sample Area 16.20 0.30 75% Field Composite 19 65 3.90 1.04 21.44 1.25 Field Composite 24 81 1.25 88% 2 1.25 81% Field Composite 14 49

1.6

Comments: The residual nitrates are moderate. Ammonium is in equilibrium. Sulfur is adequate, while boron is possibly marginal. Sodium is favorably lower.

	THE RESERVE OF THE PARTY OF THE	
Immobile	African in make	/

195

Chemical Data

Sample Area Field Composite

ZnMn Fe 1' 126 405 12.0 1.3 22

EC mmhos/cm 7.3

Eff/Calc.

Comments: The soil P, K, and Zn are sufficient. Mn is low, while Fe and Cu are sufficient. Organic matter is high. Soil pH is near neutral, while salts are low.



AGRIMETRIC SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0560

7572

Field: GDS-SU-04

135.6 Acres:

Sample Date: 10/14/2013

Crop: Triticale-Silage Corn

Irrigation: Center pivot

Previous Crop:

2013 Triticale-Silage corn

Current Crop:

2014 Tritticale-Sitage com

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites: 30

Topography:

Gently divided sloping

Avg Sampling Depth:

Restrictive layer?

Y Where? Some rocks, mainly in the NW corner.

Residue Incorp?

N Type? Scattered cultivation strips.

Comments: Sampled a three foot field composite. Light weed cover. Corn stalk size was normal. Soil surface was

dry.

		ppm	Mobile I	Exch. /	Exch. / Soluble Bases (meq/100g)						Other Data			
Sample Area	Depth	NO ,	NO 3	NH 4	SO,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	184	624	7	925	10.8	17.10	4.80	8.79	1.27	29.96	16.0	1.25	90%
Field Composite	2*	166	564										1.25	85%
Field Composite	3"	173	587										1.25	100%
		Totale:	1774	7	025	10.8								

The residual nitrates are excessive. Ammonium is in equilibrium. Sulfur and boron are very high. Sodium is slightly to moderately elevated.

Immobile Nutrients (ppm)

Chemical Data

Sample Area Field Composite

P P(ccs) K 398 2650 13.5 2.9 O.M. pHEC mmhos/cm 3.3% 7.8

Eff/Calc.

Comments: The soil P and K are very high, and Zn is high. Mn is low, while Iron and Copper are adequate. Organic matter is high. The soil pH remains alkaline and salts are high.

and and and and and and and a		
AGRIMETRIC SERVICES - MEASUR	ING CROP NEEDS	FOR GREATER PROFITS
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Fertility Report

George DeRuyter & Sons (Y281)

F13-0540

7575

Field: GDS-SU-07

76.6 Acres:

Sample Date: 10/9/2013

Crop: Alfalfa

Irrigation: Center pivot

Previous Crop:

2013 Alfalfa

Soil series:

Warden silt loam

Leach Hazard: Low

30

Current Crop: 2014 Alfalfa

No. of Sites:

Topography:

Gently undulating.

Avg Sampling Depth:

Restrictive layer?

Y Where? Rocks in scattered sites.

Residue Incorp?

N Type?

Comments: Sampled a three foot field composite. Harvested recently. Alfalfa at 2-3" tall with a 50% canopy overall.

		ppm	Mobile I	Mobile Nutrients (lbs/ac)				Exch. / Soluble Bases (meq/100g)						
Sample Area	Depth	NO,	NO,	NH 4	SO,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1"	31	104	5	286	5.1	19.90	4.00	1.94	0.72	26.56	16.1	1.25	78%
Field Composite	2	74	252										1.25	82%
Field Composite	3"	76	257										1.25	74%
		Totals	813	- 5	286	5.1								

Comments: Residual nitrates are high. Ammonium is in equilibrium. Sulfur and boron are also high. Sodium is only slightly elevated.

Sample Area		Imm	obile	Nuti	rients	(ppi	n)	Chemical Data				
	Depth	PPo	∾ K	Zn	Mn	Fe	Cu	O.M.	pН	EC mmhos/cm	Eff/Calc.	
Field Composite	1	90	757	9.1	1.5	17	2.0	1.9%	7.6	0.48	Yes	

Comments: Soil P, K, and Zn are high. Mn is low while Fe and Cu are sufficient. Organic matter is above average. Soil pH is moderately alkaline, while salts are okay.

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AGRIMETRIC	SERVICES -	MEASURING CROP NE	EDS FOR GREATER PR	OFITS
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Fertility Report

George DeRuyter & Sons (Y281)

F13-0580

7574

Field: GDS-SU-06

Acres:

Sample Date: 10/16/2013

Crop: Triticale-Silage Corn

Irrigation: Center pivot

84.5

Previous Crop: 2013 Triticale-Silage com

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites: 32

Current Crop: 2014 Triticale-Silage com

Topography:

Gently undulating

Avg Sampling Depth: 2.7

Restrictive layer? Residue Incorp?

Y Where? Scattered moderately compacted zones, and rocks at 18-36".

N Type? Light to moderate stalks and weeds.

Comments: Sampled a three foot field composite. Post harvest. Soil surface dry. Scattered light to moderate weeds. Scattered areas with light salts visible on the surface.

		ppm	Mobile I	Vutrien	ts (lbs/	(ac)	Exch. /	Solut	le Ba	ses (meq/1	(00g)	Other	Data
Sample Area	Depth	NO ,	NO,	NH 4	so,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1"	47	161	5	384	6.2	17.00	4.30	3.38	0.70	25.38	17.4	1.25	65%
Field Composite	2'	82	277										1.25	75%
Field Composite	3'	102	348										1.25	70%
		Tatala	700	- 100	204	0.0								

Comments: Residual nitrates are high. Ammonium is in equilibrium. Sulfur and boron are high. Sodium is slightly elevated.

		Imn	nobile	Nuti	rients	(ppi	n)	Chemica	l Data	,	
Sample Area	Depth	P	(ace) K	Zn	Mn	Fe	Cu	O.M.	pН	EC mmhos/cm	Eff/Calc.
Field Composite	1	162	1320	10.1	1.6	17	2.0	2.5%	7.9	0.74	Yes

Comments: Soil P, K, and Zn are high. Mn is low, while Fe is marginal, and Cu is sufficient. Organic matter is above average. Soil pH is quite alkaline, while salts are only slightly elevated.



AGRIMETRIC SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0601

7576

Fleld: GDS-SU-08

Acres:

165.5

Sample Date: 10/17/2013

Crop: Triticale-Silage Corn

Irrigation: Center pivot

Previous Crop: 2013 Triticale-Silage com

Soil series:

Warden silt loam

Current Crop: 2014 Triticale-Silage com

Leach Hazard: Low

No. of Sites:

30

Topography:

Gentle undulation, south slope.

Avg Sampling Depth: 2.6

Restrictive layer? N Where? Hard pan starting at about 24".

Residue Incorp?

N Type? Corn stalks still standing.

Comments: Sampled a three foot field composite. Corn stalks were a fair to average in size, weak and strong stalks were mixed throughout the field. Some smut bodies on the remaining stalks. Salts on the soil surface.

		ppm	Mobile I	Nutrien	ts (lbs/	/ac)	Exch. /	Solut	le Ba	ses (meq/1	(00g)	Other	Data
Sample Area	Depth	NO,	NO,	NH ,	SO ,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	161	549	4	755	9.2	17.10	5.00	7.63	1.27	31.00	17.6	1.25	77%
Field Composite	2	161	546										1.25	79%
Fleid Composite	3"	139	472										1.25	74%
		Totals:	1567	4	755	9.2								

Comments: The residual nitrates are high. Ammonium is in equilibrium. Sulfur and Boron are high. Sodium is moderately elevated.

Immobile Nutrients (ppm)

Chemical Data

Sample Area Field Composite

P P(ece) K 243

pHO.M. 3.4% 7.7

EC mmhos/cm 1.63

Eff/Calc.

Comments: The soil P, K, and Zn are very high. Mn is low, while Fe and Cu are sufficient. Organic matter is high. Soil pH is alkaline and salts are moderately elevated.

Other Data

(ppm) (Tons/Ac)

Saturated Paste Extraction

Sample Area

Cl HCO 3 Lime Reg SMP pH

EC mmhos/cm

Field Composite



AGRIMETRIC SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0539 7573

Field: GDS-SU-05

Acres:

Sample Date: 10/9/2013

Crop: Triticale-Silage Corn

Previous Crop:

2013 Tritticale-Silage Corn

Irrigation: Center pivot

100.6

Current Crop:

2014 Triticale-Silage Com

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites:

Topography:

Gently to moderately undulating.

Avg Sampling Depth: 2.4

Restrictive layer?

Y Where? Rocks throughout at scattered sites.

Residue Incorp?

N Type? Light stalks, partly disked in early fall.

Comments: Sampled a three foot field composite. There had been moderate to heavy weeds in this field.

		ppm	Mobile I	Vutrien	ts (lbs	/ac)	Exch. /	Solut	le Ba	ses (meq/1	(00g)	Other	Data
Sample Area	Depth	NO,	NO 3	NH 4	SO.	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	263	894	4	972	12.3	17.10	5.10	7.62	1.45	31.27	17.4	1.25	74%
Fleid Composite	2'	254	864										1.25	72%
Fleid Composite	3'	263	894										1.25	81%
		Totals:	2652	4	972	12.3								

Comments: Residual nitrates are excessive. Ammonium is in equilibrium. Sulfur and boron are very high. Sodium is moderately elevated.

Immobile Nutrients (ppm)

Chemical Data

Sample Area Field Composite Depth P P(see) K 1' 529 2970 12.8 2.1 17.1 O.M. pH1.6%

EC mmhos/cm 3.56

Eff/Calc.

Comments: Soil P, K, and Zn are excessive. Manganese is low, while Iron and Copper are adequate. Soil pH is alkaline, while salts are very high.

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AGRIMETRIC	SERVICES -	MEASURING	CROP NEEDS	FOR GREATER	PROFITS
106	سالي	mund		th	

Fertility Report

George DeRuyter & Sons (Y281)

F13-0561

7577

Field: GDS-SU-09

34.6 Acres:

Sample Date: 10/14/2013

Crop: Triticale-Silage Corn

Irrigation: Center Pivot

Previous Crop: 2013 Alfalfa

Current Crop: 2014 Triticale-Silage Com

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites: 30

Topography:

Restrictive layer?

Split by swale, gently undulating

Avg Sampling Depth: 2.9

Residue Incorp?

Y Where? Some rocks and hard pan. N Type? Light to moderate crowns.

Comments: Sampled a three foot field composite. The average sampling depth was at 34". At the time of sampling the alfalfa was at 1-3" tall. The soil surface was dry. Weeds were minimal, some dandelion. The soil was very compacted. Water in the swale with grassy vegetation.

		ppm	Mobile I	Vutrien	ts (lbs,	/ac)	Exch. /	Solut	le Ba	ses (meq/1	(00g)	Other	Data
Sample Area	Depth	NO,	NO,	NH ,	SO ,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	25	84	3	160	4.3	19.40	4.00	2.05	0.61	26.06	14.5	1.25	70%
Field Composite	2'	28	96										1.25	40%
Field Composite	3'	27	92										1.25	50%
		Totale	272	3	180	43								

Comments: Residual nitrates are moderate to high. Ammonium is at equilibrium. Sulfur and boron are plenty high. Sodium is only slightly elevated.

Sample Area		Imm	obile	Nuti	rients	(ppi	n)	Chemica	l Data		
	Depth	PP	co) K	Zn	Mn	Fe	Cu	O.M.	pН	EC mmhos/cm	Eff/Calc.
Field Composite	1'	150	800	8.5	2.5	26	2.0	2.4%	7.5	1.05	Yes

Comments: The soil P, K, and Zn are plenty high. Mn is low, while Fe and Cu are adequate. Organic matter is above average. The soil pH is moderately alkaline, while salts are slightly elevated.



AGRIMETRIC SERVICES - MEASURING CROP

Fertility Report

George DeRuyter & Sons (Y281)

F13-0568

7578

Field: GDS-SU-10

38.5 Acres:

Sample Date: 10/15/2013

Crop: Alfalfa

Irrigation: Center pivot

Previous Crop: 2013 Triticale-Silage com

Current Crop: 2014 Alfalfa

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites: 25

Topography:

Gently undulating

Avg Sampling Depth: 3.0

Restrictive layer? Residue Incorp?

Y Where? Scattered compacted zones at 26-36", caliche in areas.

N Type? Light to moderate residue.

Comments: Sampled a three foot field composite. Post harvest. Very light scattered salts on the surface. Light to moderate weeds. Generally good stalk diameter.

		ppm	Mobile N	Vutrient	ts (lbs)	(ac)	Exch. /	Solut	ole Ba	ses (meq/1	(00g)	Other	Data
Sample Area	Depth	NO,	NO ,	NH 4	so,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	49	167	2	153	2.2	19.80	3.00	1.85	0.69	25.34	, E	1.25	75%
Field Composite	2"	38	128										1.25	74%
Field Composite	3"	22	74										1.25	72%
		Totals:	989	2	153	22								

Comments: The residual nitrates are high. Ammonium is in equilibrium. Sulfur is plenty high, and boron is sufficient. Sodium is slightly elevated.

		Imme	obile	Nutr	ients	(ppi	n)	Chemica	l Date	1	
Sample Area	Depth	P P(ec	K	Zn	Mn	Fe	Cu	О.М.	pН	EC mmhos/cm	Eff/Calc.
Fleid Composite	41	53	723	40	12	11	11	2 2%	7.8	0.56	Yes

Comments: The soil P, K, and Zn are plenty high. Mn and Fe are low, while Cu is sufficient. Organic matter is above average. Soil pH is moderately alkaline, while salts are favorably lower.



AGRIMETRIC SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0581

7579

Field: GDS-SU-11

Acres:

Sample Date: 10/16/2013 8.1

Crop: Alfalfa

Irrigation: Wheel line

Previous Crop: 2013 Triticale-Sudan grass

Current Crop: 2014 Alfalfa

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites: 18

Topography:

Avg Sampling Depth: 2.7

Restrictive layer? Y Where? Scattered areas of moderately to significantly compacted soil in the 20-36" range.

Residue Incorp? N Type? Light Sudan residue.

surface.

Comments: Sampled a three foot field composite. Post harvest. Alfalfa planted. Scattered areas of light salts on the

		ppm	Mobile I	Vutrien	ts (lbs,	(ac)	Exch. /	Solut	ole Ba	ses (meq/1	(00g)	Other	Data
Sample Area	Depth	NO,	NO,	NH 4	so,	B	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	39	132	9	116	3.6	17.80	4.00	2.32	0.54	24.66		1.25	70%
Field Composite	2'	38	129										1.25	75%
Field Composite	3'	31	104										1.25	80%
		THE A. L.	0.00		440	0.0								

Comments: Residual nitrates are high. Ammonium is in equilibrium. Sulfur and boron are plenty high. Sodium is only slightly elevated.

Sample Area		Imm	obile	Nuti	rients	(ppi	m)	Chemica	i Data	,	
	Depth	P	N K	Zn	Mn	Fe	Cu	O.M.	pН	EC mmhos/cm	Eff/Calc.
Field Composite	1	161	903	10.4	2.3	28	2.8	3.2%	7.6	0.48	Yes

Comments: Soil P, K, and Zn are high. Mn is low, while Fe and Cu are sufficient. Organic matter is high. Soil pH is medium alkaline, while salts are favorably low.



AGRIMETRIC SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0527

7580

Field: GDS-SU-12

40.5 Acres:

Sample Date: 10/7/2013

Crop: Triticale-Silage Com

Previous Crop: 2013 Triticale-Silage com

Irrigation: Rill

Current Crop: 2014 Triticale-Silage com

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites: 25

Topography:

Very gentle to gentle S-SW slope

Restrictive layer?

Y Where? Compacted soil and rocks in scattered sites.

Avg Sampling Depth: 2.8

Residue Incorp?

Y Type? Light stalks.

Comments: Sampled a three foot field composite. Stalk diameter is generally okay. Some small weed patches.

Closely planted in the West Half.

		ppm	Mobile Nutrients (lbs/ac)			Exch. / Soluble Bases (meq/100g)					Other Data			
Sample Area	Depth	NO,	NO,	NH 4	SO.	B	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	168	570	9	670	3.0	21.30	4.20	1.73	0.59	27.82	16.1	1.25	80%
Field Composite	2	125	426										1.25	88%
Field Composite	3'	95	322										1.25	95%
97		Totals:	1318	8	670	3.0								

The residual nitrates are high. Ammonium is in equilibrium. Sulfur is high, while boron is sufficient. Comments: Sodium is only slightly elevated.

-		-
Immobile	Nutrients	(ppm)

Chemical Data

Sample Area Field Composite

Cu Mn Fe 6.0 3 26 1.6 875

pHEC mmhos/cm 7.2 1.57

Eff/Calc.

Comments: The soil P, K, and Zn are high. Mn is low, while Fe and Cu are sufficient. Organic matter is high. The soil pH is near neutral, while salts are slightly elevated.

Comments: Given the scattered soil compaction, it is recommended that you could do some ripping. Ripping is best done when the soil profile is slightly moist (as post harvest in the fall).

Attachment 4:

WSDA Public Records Request January 2022

WA Department of Agriculture Public Records Request about a month ago R002625-110621



I write to request access to, and copies of all best management practices for dairies that have been officially approved by the WA State Dept. of Ecology and the WA State Dept. of Agriculture, from Jan. 1, 1990, to the present. I request copies of any best management practices that approve composting animal waste in the pens and corrals where dairy cows live. Best management practices are defined in WAC 173-201A-020 as "physical, structural, and/or managerial practices approved by the department that, when used singularly or in combination, prevent or reduce pollutant discharges."

Status: No Records Exist

Mrs. Jean Mendoza

Dear Mrs. Jean Mendoza,

The Washington State Department of Agriculture received a public records request from you on November 06, 2021. Your request mentioned:

"Dear Public Records Officer:

Pursuant to the WA State Public Records Act RCW §§ 42.56.001 to 42.56.904, I write to request access to, and copies of all best management practices for dairies that have been officially approved by the WA State Dept. of Ecology and the WA State Dept. of Agriculture, from Jan. 1, 1990, to the present. I request copies of any best management practices that approve composting animal waste in the pens and corrals where dairy cows live. Best management practices are defined in WAC 173-201A-020 as "physical, structural, and/or managerial practices approved by the department that, when used singularly or in combination, prevent or reduce pollutant discharges."

If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. If WSDA contends that any responsive material is exempt from disclosure, please provide a redaction log containing a description of each redaction or document withheld, the statutory basis for each redaction or withholding, and an explanation sufficient for us to ascertain the applicability of each claimed exemption (e.g. a summary of the document's contents, the date of its creation, the parties who participated in drafting it, the parties to whom it was disseminated, etc.). RCW § 42.56.210(3); WAC 44-14-04004(4)(b)(ii): PAWS v. Univ. of Wash., 125 Wn.2d 243, 270-71 (1994).

If the cost would be greater than \$50.00, please notify me. Please provide a receipt indicating the charges for each

As provided by the open records law, I will expect your response within five (5) business days of the date of this request. RCW § 42.56.520.

Thank you for your assistance."

We have searched the department's records and found no records which respond to your request.

This completes my response. I have closed this request.

If you have any questions, please feel free to contact me at 360-902-1935.

Sincerely,

Pamela Potwin Public Records Officer 360-902-1935

WA Ecology Public Records Request January 2022

P008198-110621

Dear Public Records Officer: Pursuant to the WA State Public Records Act RCW §§ 42.56.001 to 42.56.904, I write to request access to, and copies of all best management practices for dairies that have been officially approved by the WA State Dept. of Ecology and the WA State Dept. of Agriculture, from Jan. 1, 1990, to the present. I request copies of any best management practices that approve composting animal waste in the pens and corrals where dairy cows live. Best management practices are defined in WAC 173-201A-020 as "physical, structural, and/or managerial practices approved by the department that, when used singularly or in combination, prevent or reduce pollutant discharges." If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. If Ecology contends that any responsive material is exempt from disclosure, please provide a redaction log containing a description of each redaction or document withheld, the statutory basis for each redaction or withholding, and an explanation sufficient for us to ascertain the applicability of each claimed exemption (e.g. a summary of the document's contents, the date of its creation, the parties who participated in drafting it, the parties to whom it was disseminated, etc.). RCW § 42.56.210(3); WAC 44-14-04004(4)(b)(ii); PAWS v. Univ. of Wash., 125 Wn.2d 243, 270-71 (1994). If the cost would be greater than \$50.00, please notify me. Please provide a receipt indicating the charges for each document. As provided by the open records law, I will expect your response within five (5) business days of the date of this request. RCW § 42.56.520. Thank you for your assistance.

Status: No Responsive Records

Forms Haff Chairte Commiste (DOH)

From: Hoff, Christy Curwick (DOH) Sent: 5/2/2022 7:08:11 AM

To: DOH WSBOH

Cc:

Subject: FW: Board Decision on Covid-19 vaccines

From: Janet Young <antiejan@gmail.com> Sent: Friday, April 29, 2022 11:38 AM

To: Hoff, Christy Curwick (DOH) < Christy. Hoff@sboh.wa.gov>

Subject: Board Decision on Covid-19 vaccines

External Email

After listening to all of the Board and TAG meetings, I am pleased with the thorough consideration of the need or not to vaccinate children in our state for Covid-19. I appreciate all of the time each member had to spend in their decision making.

I am very appreciative of the Board's decision not to recommend mandatory Covid-19 vaccination for Washington's school children. This is a very serious subject that parents need to ponder and make a decision for their own children. We do not know the long-term effects of this vaccine in children.

Sincerely,

Janet M. Young

Maple Valley, WA

April 29, 2022

From: Carole Schuh

Sent: 4/26/2022 10:15:07 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Keeping of Animals Memo

External Email

As a member and representative of Back Country Horsemen of Washington, I am requesting the draft proposal of the keeping of animals be postponed from June's hearing. I suggested a work group/task force of stakeholders will be allowed to convene and sort out the concerns prior to the hearing.

Thank you ~ Carole Schuh 2551 Drummond Rd Mesa, WA 99343

From: Tera Tagliabue

Sent: 6/3/2022 11:57:17 AM

To: DOH WSBOH

Cc:

Subject: No to COVID shots for school

External Email

Dear BoH,

I know you are not currently discussing adding COVID shots to the list of school immunization requirements, but I know you may consider it again. I therefore want to restate my strong opposition to EVER requiring COVID shots for participation in school or daycare.

It is widely evident that the shot is ineffective at protecting from infection or transmission of the coronavirus. Whereas the evidence continues to mount that there are huge safety concerns related to the shots. Children are at minimal risk of adverse reactions from the coronavirus whereas they have an increased risk of adverse effects from the shot, and each booster would further exacerbate that risk.

The shot is not safe or effective and the risk for children far exceeds the possible benefit. Therefore please do not consider adding the COVID shots to school and daycare immunization requirements.

Citizens of WA state are watching. Also Do not attempt to mandate a small pox shot or a monkey pox shot or any other shot that is rapidly developed and deployed without adequate safety data.

Thank you, Tera Tagliabue

Sent from my iPhone

From: happydog023@centurylink.net

Sent: 4/23/2022 11:19:30 AM

To: DOH WSBOH

Cc:

Subject: Illinois based program SHIELD

External Email

Hello,

I am deeply concerned regarding the Illinois based program called SHIELD. It is an invasive program of testing, tracking, and restriction of God given natural rights afforded to us and ensured by our Constitution, Bill of Rights, and the Declaration of Independence. It requires millions of dollars being invested in labs and mobile units, another divestiture of taxpayer dollars into the biosecurity industry. This cannot be implemented in our state. It is a thinly veiled "healthcare" program that redistributes wealth and exert total control over the population. We the people do not comply or consent to this.

Please familiarize yourselves with this and reject it soundly.

Thank you,

Donna Moore

- C - DI - L - :

From: Garry Blankenship Sent: 4/20/2022 9:46:03 AM

To: hcinfo.infosc@canada.ca,DOH WSBOH,ombuds@oc.fda.gov,Van De Wege,

Kevin, Pederson,

Annika,mozias@co.clallam.wa.us,rjohnson@co.clallam.wa.us,shahidafatin@gmail.com,gbsjrmd@sisna.com,

Cc:

Subject: COVID Management

External Email

Good Day,

Facts now show the health management recommended mRNA drugs are neither safe nor effective. Polar opposite to what health management espoused and mandated. The gravity of adverse reactions is terrible and compounding. Again the opposite of what health management espoused as safe. The infinitely superior protection of natural immunity is now unquestionable, but not acknowledged by health management. The absence of early treatment with safe and effective drugs was banned by health management. The use of health management implemented Remdesivir and respirators accelerated and manifested unnecessary death.

It is not my intent to be sarcastic. That said, the now known facts dictate that we / the public do not need health management protection from COVID. We need protection from health management. A horrible irony. Is there any way existing health management could correct this egregious incompetence? A response would be sincerely appreciated.

Sincerely,

Garry Blankenship

From: Lyn

Sent: 4/29/2022 4:13:11 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal Waste Rule

External Email

Attn: Board Members

I urge you to delay or cancel the Draft Policy proposal scheduled for June 2022.

At a minimum, more time should be allotted to allow stakeholders to research this proposed rule.

Thank you.

Lynette Borcherding

From: Yvonne Fox

Sent: 6/1/2022 10:42:43 AM

To: DOH WSBOH

Cc:

Subject: Covid 19 shots for kids

External Email

No way should covid shots be added to the many kids are required to get before starting school. There is WAY too much information on these "vaccinations" being ineffective and causing all sorts of problems. All for a plandemic that you are contributing to by perpetuating the fear and promoting the hoax. DO YOUR JOBS and educate yourselves! (or is the money you're receiving too good to give up? not to mention the power you must feel!)

Signed,

ONE ANGRY MAMA

From: Glasoe, Stuart D (SBOH) Sent: 5/2/2022 8:36:06 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: FW: CR 102 Domestic Animal Waste

Stuart Glasoe

SBOH Health Policy Advisor

360-236-4111

From: Jon Borcherding < jonreadsitall@protonmail.com>

Sent: Sunday, May 1, 2022 3:28 PM

To: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>

Subject: CR 102 Domestic Animal Waste

External Email

The Washington State Board of Health has chosen a remarkably inopportune moment to address what is described as a long-standing issue.

With supply-chain problems and fertilizer shortages affecting the global food supply, many experts including the Biden Administration are predicting food shortages. The recent destruction of at least 12 major food production plants will likely also contribute to food shortages. The nation's railways are refusing shipment of nitrogen fertilizers during the current planting season. The FBI has just released a bulletin outlining the threat of cyber attacks against agricultural facilities. There is NO shortage of threats to America's food supply.

In addition to the looming specter of food scarcity is the alarming rate of inflation which disproportionately impacts the poor by making food more and more unaffordable.

In an effort to stave off shortages and hunger, many homeowners are engaging in small scale food production i.e., vegetable gardens, raising chickens, rabbits, pigs, goats, sheep, etc. Any new regulation that impedes the homestead production of vital food resources is bound to be met with fierce resistance.

In an era when we are experiencing global shortages of nitrogen fertilizers due to foreign conflict, it seems like a good time to review our attitudes about animal waste products and learn to treat them like the resource they are.

There are already laws on the books regarding proper animal husbandry and the Board would be well advised to address current problems within the existing framework. New rulemaking at this time is also bound to lead to increased cost to the taxpayer at a time when we are seeing record inflation.

Has the Board estimated the cost of enforcement of new proposals? Surely there is an

awareness that commissioned law officers and search warrants will be necessary to investigate the disposition of animal waste on private property?

Also at issue is the credibility of the Health Department. It is not reasonable to expect homeowners to accept heavy handed regulation of traditional food production activities on their private property, particularly at a time when homestead food production may be key to survival. One can easily imagine the erosion of respect resulting from any attempt to use government force to hinder necessary farming activity.

I strongly urge the Washington State Board of Health to delay the Draft Policy proposal scheduled for June 2022. I believe it is in the best interests of all citizens that a work group or task force is formed to study the concerns of all stakeholders and advise the Board prior to the drafting or adoption of any new rules regarding the keeping of animals.

Sincerely,

Jon M. Borcherding

Roy WA

Sent with ProtonMail

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fprotonmail.com%2F&data=05%76 secure email.

From: B. D.

Sent: 4/30/2022 7:51:48 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: PleaseDelay

External Email

We as Equestrians have many concerns in regards to recent ramrod proposals and how it affects us or may affect us.

We respectfully please ask that the Draft Policy proposal be delayed to at least June and that a work group/task force is formed to vet out our concerns.

Sincerely

Barbara & David Dorning

BCHWA-Members

Sent from my Verizon, Samsung Galaxy smartphone Get Outlook for Android

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Faka.ms%2FAAb9ysg&data=05%7

From: Barbara Connelly Sent: 4/19/2022 7:07:02 AM

To: DOH WSBOH, DOH Secretary's Office

Cc:

Subject: Thank You for Listening to the Citizens of WA State

External Email

Dear BOH Members: Thank you for listening to the concerns of us as citizens of Washington State and for voting to adopt the TAG's recommendation to not add the COVID-19 vaccine to Washington's list of required immunizations for child care and school entry at your April 13 virtual public meeting. We are confident that the emerging scientific data will continue to affirm your decision. Thank you for your thoughtful consideration in your role to protect the health of the children in our State. respectfully,

From: Janet Young

Sent: 4/29/2022 11:15:42 AM To: Thai, Nathaniel J (SBOH)

Cc:

Subject: Board Decision on Covid-19 vaccines

External Email

After listening to all of the Board and TAG meetings, I am pleased with the thorough consideration of the need or not to vaccinate children in our state for Covid-19. I appreciate all of the time each member had to spend in their decision making.

I am very appreciative of the Board's decision not to recommend mandatory Covid-19 vaccination for Washington's school children. This is a very serious subject that parents need to ponder and make a decision for their own children. We do not know the long-term effects of this vaccine in children.

Sincerely, Janet M. Young Maple Valley, WA April 29, 2022 From: Nancy the Soul Dancer Sent: 5/5/2022 3:24:50 PM

To: DOH WSBOH

Subject: Covid Moderna Trial Data Predict 'Pandemic of the Vaccinated?

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attachments\EA0CF075DD7042DB_image003.jpg

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External Email

Covid Moderna Trial Data Predict 'Pandemic of the Vaccinated?'

A new study based on Moderna's Phase 3 clinical trial data suggests recipients of Moderna's COVID-19 vaccine may be more likely to suffer repeated infections, perhaps indefinitely.

Ву

Madhava Setty, M.D.

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https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.facebook.com%2Fsharer.ph trial-data-pandemic-

vaccinated%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c899b1f4449233008da2ee5da65%7

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.twitter.com%2Fintent%2Ftwtrial-data-pandemic-

vaccinated%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c899b1f4449233008da2ee5da65%7

Link copied

A new study

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.medrxiv.org%2Fcontent%2Fsuggests recipients of Moderna's COVID-19

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fchildrenshealthdefense.org%2Fdevaccine may be more likely to suffer repeated infections, perhaps indefinitely.

The study, still in preprint, found participants in Moderna's adult trial <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.nejm.org%2Fdoi%2Ffull%2Fwho received the vaccine, and later were exposed to the virus, did not generate antibodies to a key component of the virus as often as did those in the placebo group.

The authors' findings, which are corroborated by U.K. data that demonstrate the rates of infection are significantly higher in the vaccinated, suggest Moderna knew of this safety signal in 2020 when the vaccine maker was conducting its trials.

The authors of "Anti-nucleocapsid antibodies following SARS-CoV-2 infection in the blinded phase of the mRNA-1273 Covid-19 vaccine efficacy clinical trial" wrote:

"Among participants with PCR-confirmed Covid-19 illness, seroconversion to anti-N Abs at a median follow up of 53 days post diagnosis occurred in 21/52 (40%) of the mRNA-1273 vaccine recipients vs. 605/648 (93%) of the placebo recipients (p < 0.001)."

Vaccinated participants in the trial who developed breakthrough COVID-19 — meaning they received a positive PCR test — mounted an antibody response to the nucleocapsid portion of the SARS-CoV-2 virus less often than did placebo recipients who tested positive for the virus.

The difference was statistically significant, leading the authors to conclude:

"Vaccination status should be considered when interpreting seroprevalence and seropositivity data based solely on anti-N Ab testing.

"As a marker of recent infection, anti-N Abs may have lower sensitivity in mRNA-1273-vaccinated persons who become infected."

In other words, the authors found that using the presence of anti-nucleocapsid (anti-N) antibodies to determine whether a person was exposed to SARS-CoV-2 will miss some infections. Thus, the sensitivity of this kind of test, when applied to vaccinated individuals, is not ideal.

However, there are more important implications of these findings, as Igor Chudov <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Figorchudov.substack.com%2Fp%2knew-vaccinated-people-will%3Futm_source%3D%252Fprofile%252F15579919-igor-accinated-people-will%3Futm_source%3D%252Fprofile%252F15579919-igor-accinated-people-will%3Futm_source%3D%252Fprofile%252F15579919-igor-accinated-people-will%3Futm_source%3D%252Fprofile%252F15579919-igor-accinated-people-will%3Futm_source%3D%252Fprofile%252F15579919-igor-accinated-people-will%3Futm_source%3D%252Fprofile%252F15579919-igor-accinated-people-will%3Futm_source%3D%252Fprofile%252F15579919-igor-accinated-people-will%3Futm_source%3D%252Fprofile%252F15579919-igor-accinated-people-will%3Futm_source%3D%252Fprofile%252F15579919-igor-accinated-people-will%3Futm_source%3D%252Fprofile%252F15579919-igor-accinated-people-will%3Futm_source%3D%252Fprofile%252Fprofi

chudov%26utm_medium%3Dreader2%26s%3Dr&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c0and others

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fboriquagato.substack.com%2Fp%vaccine-failure-becomes-more-vaccine-failure-becomes-waccine-fai

and%3Fs%3Dr&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c899b1f4449233008da2ee5da65%7were quick to recognize.

Specifically, the study implies that the reduced ability of a vaccinated individual to produce antibodies to other portions of the virus may lead to a greater risk of future infections in the vaccinated compared to the unvaccinated.

1 Million Copies Sold — 'The Real Anthony Fauci' — The book that launched a movement. BUY TODAY!

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.amazon.com%2FReal-Anthony-Fauci-Democracy-

Childrens%2Fdp%2F1510766804&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c899b1f44492330

It is important to note that this is not just another argument for the superiority of natural immunity

< https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fchildrenshealthdefense.org%2Fdenatural-immunity-trumps-vaccine-

immunity % 2F & data = 05% 7C01% 7C wsboh % 40 sboh. wa. gov % 7C3 ba 72 c899 b1f 4449233008 da 2ee 5 da 65% 7C barrier was also between the contraction of the con

Rather, this is evidence suggesting that even after a vaccinated person has a breakthrough

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fchildrenshealthdefense.org%2Fdeyear-old-shawn-kuhn-fully-vaccinated-student-dies-

covid%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c899b1f4449233008da2ee5da65%7C11c infection, that individual still does not acquire the same level of protection against subsequent exposures that an unvaccinated person acquires.

This is a troubling finding, and something investigators conducting the Moderna vaccine trial likely knew in 2020.

Let's establish some background facts:

- * Anti-nucleocapsid antibodies are antibodies specific to the nucleocapsid portion of the SARS-CoV-2 virus, the virus responsible for COVID-19.
- * One method of determining whether an individual has been exposed to the virus (recently or in the past) is by detecting antibodies specific to the virus in the person's serum.
- * Because those who have been vaccinated will, ostensibly, have anti-spike-protein antibodies, using anti-spike levels to diagnose prior or recent infection is impossible in those people.

However the presence of anti-nucleocapsid antibodies after exposure should, in theory, be unaffected by vaccination status.

- * Though the presence of an anti-N antibody is not necessarily indicative of immunity, having a broad set of antibodies to different components of the virus offers more robust protection than having antibodies to a single component, e.g. the spike protein. This is one reason natural immunity is superior to mRNA vaccine-mediated immunity.
- * The paper does not offer any new findings. Instead it presents an analysis of what should have already been known from Moderna's vaccine trial.

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.nejm.org%2Fdoi%2Fpdf%2Fpdf%2Fwww.nejm.org%2Fdoi%2Fpdf%2Fpdf%2Fwww.nejm.org%2Fdoi%2Fpdf%2Fpdf%2Fwww.nejm.org%2Fdoi%2Fpdf%2Fpdf%2Fpdf%2Fwww.nejm.org%2Fdoi%2Fpdf%2F

Breakthrough infections result in N-antibody production less often than in primary infection

Moderna enrolled more than 30,000 subjects in its trial, randomizing them equally to the vaccine or placebo.

At the end of the initial observation period, 13 times more placebo recipients contracted COVID-19, allowing the investigators to boast a Vaccine Efficacy (VE) of 93.2%.

The U.S. Food and Drug Administration (FDA) subsequently authorized <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.fda.gov%2Femergency-preparedness-and-response%2Fcoronavirus-disease-2019-covid-19%2Fspikevax-and-moderna-covid-19-

vaccine&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c899b1f4449233008da2ee5da65%7C11d0ethe vaccine for emergency use. The rest is history.

This recent study examined the presence or absence of anti-nucleocapsid antibodies in all trial participants who contracted COVID-19, based on a positive PCR test, during the trial period.

As stated earlier, the placebo recipients produced anti-N antibodies more than twice as often as their counterparts who were vaccinated. (Chudov offers a good explanation of the significance of anti-N antibodies here

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Figorchudov.substack.com%2Fp%2week-42-45-do-the-vaxxed-

acquire % 3 Fs % 3 Dw & data = 05% 7 C01% 7 Cwsboh % 40 sboh. wa. gov % 7 C3 ba 72 c899b1f4449233008 da 2ee 5 da 6.)

This is a puzzling finding. Why would vaccination suppress a person's ability to produce antibodies to different parts of the virus when exposed to the entire virus?

One possibility is that if the vaccine is protective, viral loads will be lower, leading to fewer seroconversions.

However, this study also found that at any given viral load, the unvaccinated produced a larger anti-N response than the vaccinated:

The plot on the left (A) shows the number of placebo and vaccine recipients who seroconverted after exposure to SARS-Co-V2 at varying levels of viral copies. We can see that regardless of vaccination status, lower viral copy numbers result in fewer seroconversions than at higher viral copy numbers.

But there is a significant difference between the vaccinated and placebo recipients.

This is demonstrated in Plot B, which shows that for any given viral copy number, the placebo recipients were significantly more likely to seroconvert. The difference is most prominent at lower viral copy numbers.

This is not a spurious finding. The UK Health Security Agency publishes weekly surveillance data

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fassets.publishing.service.gov.uk%surveillance-report-week-

13.pdf&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c899b1f4449233008da2ee5da65%7C11d0e2and monitors the levels of anti-N antibodies in their blood donors.

They noted the lower levels of these antibodies in vaccinated individuals who had breakthrough infections. However, they attributed this lower level to the protective benefit of the vaccine.

According to a March 22 report by the U.K. agency:

"These lower anti N responses in individuals with breakthrough infections (post-vaccination) compared to primary infections likely reflect the shorter and milder infections in these patients."

Though vaccination may for some time decrease severity of the disease, "shorter and milder" (less severe) infections are associated with

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.nature.com%2Farticles%2Fs020-19057-

5&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c899b1f4449233008da2ee5da65%7C11d0e21726 lower viral load.

As the data above demonstrate, the vaccinated have a lower anti-N antibody conversion rate than the unvaccinated at all levels of viral load.

This is one of the most significant findings of the study because it overturns the heretofore unchallenged idea that decreased seroconversion in the vaccinated is due to less severe infection in this population — which is a benefit provided by the vaccine.

However, this new study shows that even at low viral loads, the unvaccinated are more likely to seroconvert than those who are vaccinated.

In fact, the difference in seroconversion rates is the greatest at lowest viral loads.

The decrease in conversion rates is not a result of a benefit from the vaccine. It is a consequence of it.

Once vaccinated, there may be no going back

The authors also uncovered another important finding: Participants in the Moderna trial who were PCR-positive and seronegative at baseline, prior to inoculation with vaccine or placebo, eventually seroconverted equally — independent of whether they received the vaccine or placebo.

This was also true in participants who received only one dose.

This means that vaccination status at the time of exposure is predictive of seroconversion rate in the future, and the effect is dose-dependent.

Whether or not seroconversion results in more robust immunity is yet to be determined. However, data from the U.K. and elsewhere suggest lower conversion rates may explain why infection rates are higher in their vaccinated population. This data is presented below.

Will repeated bouts of COVID-19 eventually lead to seroconversion in the vaccinated? The study could not answer this question.

More importantly, how will regular boosting affect seroconversion rates as time goes on? This is another important question yet to be answered.

There is no question that vaccine-mediated immunity against COVID-19 wanes and is waning faster as time goes on. The Centers for Disease Control and Prevention (CDC) recommended

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2Fncov%2Fvaccines%2Fbooster-

shot.html%3Fs_cid%3D11706%3Acdc%2520covid%2520booster%3Asem.ga%3Ap%3ARG%3AGM%3Agen a first booster after five months and a second after only four.

Israeli data

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fchildrenshealthdefense.org%2Fdevaccine-advisors-waning-efficacy-boosters-waning-efficacy-boosters-

injured%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c899b1f4449233008da2ee5da65%7C1 surrounding the effectiveness of a second booster demonstrated that effectiveness in preventing "severe disease" (not hospitalization) fell to just above 50% within seven weeks.

If a third booster is offered, it will probably be recommended sooner than four months after the second, based on this disappointing data.

There is more disappointing data coming from the U.K. In their last weekly surveillance report

- https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fassets.publishing.service.gov.uk%surveillance-report-week-
- 13.pdf&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3ba72c899b1f4449233008da2ee5da65%7C11d0e2, which includes case rates between the unvaccinated and boosted citizens, the Health Security Agency offered this disquieting table:

From: Reese

Sent: 4/30/2022 1:25:42 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: comments on CR-102 Keeping of Animals

External Email

As a member of Back Country Horsemen of Washington (BCHW) and horse owner on Whidbey Island, I agree with the concerns of BCHW regarding Proposed Rule CR-102 Keeping of Animals. These concerns include mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concerns of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officers) and more.

I compost my horse's manure and for my garden and other plants. The rule does not clearly allow composting and spreading livestock manure. Livestock are herbivores. Their manure does not have the pathogens that are present in carnivores such as dogs and cats. If this rule does not clearly state that the composting and spreading of livestock manure is allowed, it will be up to local health officers to make this judgment which will likely be different from jurisdiction to jurisdiction. If I will be required remove my horse's manure, the cost will be prohibitive. I would like the WA Board of Health to delay the Draft Policy proposal in June, and a work group/task force be formed to vet out these concerns.

Thanks you for your consideration. Sandy Reese 892 Holbrook Rd Coupeville, WA 98239 (530)276-5742 From: Theresa Everest

Sent: 4/22/2022 8:42:18 PM

To: DOH WSBOH

Cc:

Subject: Covid Policies

External Email

I am completely against any of the proposed Covid Policies that are over reaching and immoral. We stand against these proposed WAC's: WAC 246-100-070, WAC 246-100-045, WAC 246-100, WAC 246-105.

Theresa Everest Everest Ranch, LLC P.O. Box 274 Northport, WA 99157 509-680-5393 From: Nancy the Soul Dancer

Sent: 5/5/2022 2:57:13 PM

To: DOH WSBOH,Amy Bolen,David Wolbrecht,jarnold@kirklandwa.gov,Jon Pascal,Kathi Anderson,Kelli Curtis,kraymond@kirklandwa.gov,Kurt Triplett,Mayor Penny Sweet,Neal

Black, Toby Nixon

Cc:

Subject: Disinformation Governance Board

External Email

Rand Paul Grills Mayorkas on Disinformation: 'I Don't Trust Government to Figure out What the Truth Is'

Sen. Rand Paul, R-Ky.,

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.foxnews.com%2Fcategory%paul&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C1331a7dc37de4e77ae0508da2ee234ea%7C11d0e21challenged Homeland Security Secretary Alejandro Mayorkas over his department's newly-announced Disinformation Governance Board, asserting that the American people do not need the federal government to tell them what the truth is. Paul specifically pointed to claims that he has made about the COVID-19 pandemic</p>

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.foxnews.com%2Fcategory%disease%2Fcoronavirus&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C1331a7dc37de4e77ae0508da2eethat has not been in line with administration policies.

"I've said a million times that cloth masks don't work. YouTube takes me down. They're a private company I can have that beef with them. What about you? You're going to look at that? I often say that natural immunity

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 $institute \% 2F\&data = 05\%7C01\%7Cwsboh\%40sboh.wa.gov\%7C1331a7dc37de4e77ae0508da2ee234ea\%7Cfrom\ having\ had\ the\ infection\ is\ equal\ to\ the\ vaccine$

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fchildrenshealthdefense.org%2Fdescientist-stephanie-seneff-neurodegenerative-disease-young-people-covid-

shots%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C1331a7dc37de4e77ae0508da2ee234ea%7C110 or better. You're going to take that down?"

In recent months, experts have said cloth masks were not very effective in combating COVID-19

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fchildrenshealthdefense.org%2Fde, yet mask mandates

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fchildrenshealthdefense.org%2Fdemandates-an-erosion-of-civil-rights-chd-e-book-available-

now%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C1331a7dc37de4e77ae0508da2ee234ea%7C11d0continued in many schools

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fchildrenshealthdefense.org%2Fdeshould-not-mandate-covid-

vaccines%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C1331a7dc37de4e77ae0508da2ee234ea%7C , and until recently on public transportation, with cloth masks being acceptable coverings. Other policies that have required vaccination or testing have failed to account for immunity from a previous infection.

Do you know who the greatest propagator of disinformation in the history of the world is? The U.S. government," Paul said.

From: Martina McHolland Sent: 4/25/2022 8:23:52 PM

To: DOH WSBOH, DOH Secretary's Office

Cc:

Subject: Thank You for Listening to the Citizens of WA State

External Email

Dear BOH Members:

Thank you for listening to the concerns of us as citizens of Washington State and for voting to adopt the TAG's recommendation to not add the COVID-19 vaccine to Washington's list of required immunizations for child care and school entry at your April 13 virtual public meeting. We are confident that the emerging scientific data will continue to affirm your decision. Thank you for your thoughtful consideration in your role to protect the health of the children in our State.

Respectfully,

Martina McHolland

From: cuanabear

Sent: 6/1/2022 11:24:14 AM

To: DOH WSBOH

Cc:

Subject: kill the covid injections

External Email

No matter how many times you put it on the agenda, BY LAW NO EUA PRODUCT OR PROCEDURE CAN LEGALLY BE MANDATED FOR US CITIZENS OR THEIR CHILDREN. The people, the Constitution of the United States and the Constitution of Washington State demand medical sovereignty, and the people will stand for nothing less. Grand juries are ongoing, and you don't want to be a defendant. Please put this issue to bed now. A vigilant citizen.

Sent with Proton Mail

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fproton.me%2F&data=05%7C01%secure email.

From: Mary Hargrove

Sent: 4/26/2022 4:33:47 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: New legislation concerning animal waste disposal

External Email

I request they postpone the draft proposal from June's hearing. We suggested they allow a work group/task force of stakeholders to convene and sort out the concerns.

Sent from my iPad

From: Linda Knutson

Sent: 4/13/2022 9:01:23 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Proposed changes to Keeping of Animal Rule

External Email

The following letter is to be distributed to a number of news media in Washington State.

I'm writing to call to your attention dramatic and alarming changes the Washington Department of Health (WDH) is proposing for WAC 246-203-130. This rule is currently titled, "Keeping of animals", but the proposed new title will be "Domestic animal waste". As the new title indicates, the WDH will no longer regulate the pollution caused by farm animals. Instead, they will focus entirely on the waste produced by domestic animals such as cats and dogs. A copy of the document, with the proposed changes, shown as strikeouts, is attached to this email.

There are approximately 200,000 dairy cows in the Lower Yakima Valley (LYV), and managing the mountainous volumes of manure they produce daily, is a logistical and environmental nightmare. It's ludicrous to assume the waste produced by family pets is significant when compared with the voluminous waste produced by factory farm animals!

For many years, the dairies have polluted the groundwater in private domestic wells in the LYV by allowing their manure lagoons to leak, and by over-appliying manure to agricultural fields. An award winning article published by reporter Lea Beth Ward in the Yakima Herald Republic (YHR) in 2008, titled "Hidden Wells, Dirty Water", documented the plight of the underprivileged residents of the LYV who were unable to drink their well water because of the pollution from the dairies. At that time, about 70 wells were polluted. Currently, over 200 domestic wells are polluted, and the number increases yearly. These residents are forced to either use bottled water, or install a water purification system.

The proposed changes in this document will allow the WDH to absolve itself from regulating the pollution caused by farm animals, and abrogate its responsibilities for protecting the health of the public. I hope you can help make the general public aware of this proposed change. Thank you for your time

Ron Sell, 15280 Douglas Road Yakima, WA 98908 (509) 930-2055

PS, I also sent this letter to the YHR and the Seattle Times Tip Lines. investigations@seattletimes.com

Philip Ferolito
Reporter / Yakima County Government, Lower Valley

Tel: 509-577-7749

Email: pferolito@yakimaherald.com

Sent via the Samsung Galaxy S20 FE 5G, an AT&T 5G smartphone

From: Donna Hollatz

Sent: 4/26/2022 12:57:21 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Please Delay Keeping of Animals Bill

External Email

Dear Legislators:

The current bill has many pitfalls, from the fact that it actually concerns "Livestock" rather than "Public Health" to the lack of coordination for Enforcement of any provisions. Please get a group task force together of Farmers/Cattlemen/Equestrians as well as urban dwellers to do a better job before passing this legislation. I don't believe that a workable solution can be accomplished by the current June deadline, so set a reasonable alternative and have knowledgeable, involved citizens work on this to avoid many nightmare situations. Livestock waste is much different than dog and cat feces and needs to be treated for what it is. Back Country Horsemen of Washington is a huge group of concerned citizens who should be involved and heard in this discussion. We are volunteers with an environmental conscience who provide many hours of service to state and federal agencies with our equines.

Jim & Donna Hollatz, BCHW-PNC 360-457-6694 Clallam County Residents _____

From: Jane P

Sent: 6/3/2022 10:12:19 AM

To: DOH WSBOH

Cc:

Subject: No Covid-19 vaccine mandate!

External Email

Hi WA State Board of Health,

More evidence came out recently showing that the Covid-19 vaccine cannot prevent the spread of the virus, but rather destroy people's immune system and leave many people injured after taking the shots. There is no way We The People will allow you to mandate this poison on our children.

Also I would like to express my support on the petition in item #13, that calls for medical workers who administer EUA shots (such as all the Covid shots), and shots that lack completed Phase III clinical trials (all the Covid shots), to give potential recipients (or parent) specific information prior to vaccination so that fully informed consent (or refusal) can happen.

A deeply concern Washingtonian

From: Megan Mauch

Sent: 6/2/2022 9:27:44 PM

To: DOH WSBOH

Cc:

Subject: Covid vaccine for school

External Email

To whom it may concern,

I am writing to express my sincerely held belief that students should not be required to have the COVID vaccine to attend school, ever. If this is a requirement, my kids will be pulled out of school.

Current enrollment is dropping quickly for a variety of reasons, but if you require the vaccine for all students it will plummet.

Requiring school staff to have the vaccine has caused a significant reduction in school employees, making the schools difficult to staff.

The vaccines have been causing many unnecessary illnesses in kids such as neurological disorders, heart problems, strokes, and other immune-deficiencies. There has been a rise of other unusual illnesses because of the damage this shot is doing to healthy kids' immune systems.

This shot is under emergency use authorization only, has not been through phase 3 trials and parents are not getting properly informed about side effects.

Finally, COVID is essentially non-existent and does not (and never had) significantly impacted kids. A vaccine is not and never has been necessary to protect them from the virus and putting their lives at risk to protect "grandma" is an abomination. Anyone seriously considering harming children will likely suffer greatly in eternity.

Make the right choice. Do not require this vaccine for children. No sensible adult would find this one bit logical. Please be a sensible adult and say no.

Thank you,

Megan Mauch

Mother of 3. Former school speech language pathologist who left due to the vaccine requirement and accommodations that accompanied an exemption. Advocate for public school kids that don't have a voice. Taxpayer. Washington resident very dissatisfied with its leadership. Let's turn this sinking ship around and allow medical freedom.

Sent from my iPhone

From: Katherine Holmes Sent: 6/3/2022 7:06:04 AM

To: DOH WSBOH

Cc:

Subject: Please do not allow the Covid 19 Shots to be added to the school schedule

External Email

Washington State schools have lost a significant number of students statewide, and 1,200 in my district alone. The students have left or not participated for many reasons, but if you add the Covid-19 shot to the schedule more will leave. These experimental medical procedures do NOT prevent infection and transmission, the known potential side effects, both short term and long term are unclear, and documented serious health risks from the shots such as myocarditis are clinically significant. College and school-aged children have an almost statistically near 0% of fatalities across the United States from the virus. There is more risk from the shot than natural infection. Are you willing to be the party financially responsible for any adverse health impacts that may occur as a result of the immunization, including legal and lawful recourse for injuries sustained from any adverse events associated with this EUA product, as the product manufacturer is not liable?

France Chairtine Diless

From: Christina Riley

Sent: 6/1/2022 1:38:53 PM

To: DOH WSBOH

Cc:

Subject: Public Comment

External Email

On the Rulemaking for medical workers who administer EUA shots (such as all the Covid shots), and shots that lack completed Phase III clinical trials (all the Covid shots), to give potential recipients (or parent) specific information prior to vaccination so that fully informed consent (or refusal) can happen. I want to continue to express my desire that the BOH should continue to follow the asking of the public and its advisors not to add to the vaccination schedule to attend public schools.

I also want to note that I oppose any changes to the Keeping of Animals, WAC 246-203-130. As a small farmer, I can say that there is no need for any changes, especially the changes recommended. Farmers need to be able to use that as needed for fertilizer, and the cost associated with changes would be cause for negative impact to small farmers.

Thank you, Christina Riley

From: DOH Information Sent: 5/5/2022 4:52:57 PM To: DOH WSBOH,DOH COVID Vaccine
Cc: Subject: FW: Question/Comment from the public
attachments\98C8DE2C2383488D_image001.png
Hello,
Can someone please respond to the inquiry below?
Thank you,
Customer Service Specialist
Center for Public Affairs
Washington State Department of Health
DOH.Information@DOH.WA.GOV < mailto:DOH.Information@DOH.WA.GOV >
1-800-525-0127 www.doh.wa.gov https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc0
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From: DOH Feedback <doh.information@doh.wa.gov> Sent: Thursday, May 5, 2022 2:17 PM To: DOH Information <doh.information@doh.wa.gov> Subject: Question/Comment from the public</doh.information@doh.wa.gov></doh.information@doh.wa.gov>
The following survey response is submitted:
1.
Please select one:

Request information about programs or services

Please enter your comments or questions in the space provided below:

https://phmpt.org/pfizers-documents/

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fphmpt.org%2Fpfizers- documents%2F&data=05%7C01%7CWSBOH%40SBOH.WA.GOV%7C6c7bc09e328d40f6c3b608da2ef25fb9 I am a concerned citizen about the Pfizer mRNA vaccine. It was a trending topic on Twitter and the concern is that although the documents show that Pfizer does not recommend the vaccine for pregnant women, the fda and Wa state board of health still recommend women take the jab. Background: A federal judge in Texas has ruled that the FDA must by the end of this month make public 12,000 pages of the data it used to make decisions about approvals for Pfizer/BioNTech's COVID-19 vaccine — and then release 55,000 pages every 30 days after that until all 450,000 requested pages are public. The most recent document dump reveals many concerning figures that may constitute fraud or malfeasance given the obvious profit incentives. Quotes from the FDA/Pfizer documents most concerning: "The effects of the covid 19 vaccine on sperm, a pregnancy, a fetus, or a nursing child is not known." "It is unknown whether covid 19 mRNA vaccines is excreted in human milk. A risk to the newborns/infants cannot be excluded. Covid 19 mRNA vaccine should not be used during breastfeeding." 1223 fatalities out of 42086 participants It is concerning. I would like the board of health to investigate the documents.

3.

If you are sending feedback on one of our Web pages, please paste the URL here: https://phmpt.org/pfizers-documents/ https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fphmpt.org%2Fpfizers-documents%2F&data=05%7C01%7CWSBOH%40SBOH.WA.GOV%7C6c7bc09e328d40f6c3b608da2ef25fb9

Would you like a response?
Tell us how to get in touch with you.
Name: Joe Muller Email: joe_muller@verizon.net <mailto:joe_muller@verizon.net> Telephone: 2678845247</mailto:joe_muller@verizon.net>
5. To receive a confirmation of your submission, please enter your email address again in
the space provided below.
 joe_muller@verizon.net <mailto:joe_muller@verizon.net></mailto:joe_muller@verizon.net>

4.

From: Cathy Halverson

Sent: 4/26/2022 10:14:58 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Keeping of Animals

External Email

As an animal owner I have concerns that not all issues have been resolved with the proposed animal waste rule. I ask that you postpone the draft proposal from June's hearing. I would like to see a work group/task force of stakeholders meet to sort this out.

Thank you,

Cathy Halverson Toledo, WA F 1: 1 11

From: Linda Hagan

Sent: 4/16/2022 1:06:26 AM

To: DOH WSBOH

Cc:

Subject: Robert Malone, MD & Dr. Bryan Ardis - Exposing the Agenda

External Email

To the WSBOH,

As you may or may not know, Dr. Robert Malone is the man who pioneered the mrna vaccines many have been given. Therefore, he is highly respected and renowned and definitely not an anti-vaxxer. Below is his recount of his "vaccine injury". In it, he refers to the excellent website,

www.howbadismybatch.com

https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.howbadismybatch.com%2F&cwhere one can discover a great deal about the FDA EUA shot received.

"How Bad is my Batch"

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Femail.mg2.substack.com%2Fc%2 l6m3yPNpc5Te8ux0Hxi_Tu3lDidad-

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The story of my vaccine injury

Robert W Malone MD, MS

Jan 13

I actually do have a personal life. In fact, my wife of 42 years and I are actually pretty private. Sharing personal history is not something I do everyday. However, as many of you know - I was vaccinated with Moderna twice and had a pretty significant vaccine injury. This was pretty early in the roll-out of the vaccines. It was long before the FOIA Japanese pre-clinical trial data that had so many red-flags and irregularities, long before we learned of all the issues with the clinical trials, and long before the VAERs and adverse events began to be known.

To write it, I have never been an "anti-vax" person. I have spent my career working with vaccines. I also know that some vaccines are "hot," and are less safe. Usually these types of vaccines are reserved for extremely dangerous viruses like Ebola or Yellow fever. Where the goal is to make the vaccine 100% effective. Other vaccines that are distributed widely, like the flu vaccines need to be very safe. The trade-off being that they are less effective. There is a whole science and art to crafting vaccines to appropriately respond to the "threat." So, I know to read the literature, do my own due-diligence, etc before taking an experimental product or any vaccine. That is what I thought I did. The government assured us that these vaccines were very safe. I could never imagine that clinical data would be corrupted and even falsified - as we now know it was.

Anyway, back to my story. I knew in the beginning of April, 2021, that I had to travel overseas and the word on the street was that the European Union was going to require full vaccination before entering any EU country by summer (that actually never happened BTW). I knew that a full vaccination protocol was a process of weeks - and that I had better get started! Furthermore, there was a lot of buzz around the idea that vaccination would help with "long-COVID." I had already had COVID, and just couldn't shake a number of chronic issues that I had developed after getting the disease. Frankly, I should have done more homework on that one- because this idea really didn't hold up to scrutiny.

Be that as it may, in April, 2021, I got vaccinated. It was early enough in the cycle that I had no choice but to take the Moderna vaccine, as that was available in my area. The vaccine was distributed at a local college, with the Army reserves administering the program.

The first shot was fine. No issues.

The second shot almost did me in. As in I almost died.

After the injection, I had the usual fatigue, muscle-ache and then the palpitations started, as well as shortness of breath. Within a couple days, it got worse - I am not someone who goes to the doctor easily, but luckily for me, I happened to have a routine appointment with my physician. She cuffed me and my systolic blood pressure was through the roof. As she is also a cardiologist, she had more tests run, started me on high blood pressure meds and we got it under control. I kind of feel like I owe her my life. A call out to the fantastic Dr. C. Bove.

Fast forward to today.

One of the people who comments on my Substack articles, pointed me to this website:

https://www.howbadismybatch.com/ https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.howbadismybatch.com%2F8

This site matches up vaccine batch codes with information from the VAERS system, which is the event reporting system run by the CDC. This site matches the vaccine batches to adverse drug reactions, death, disability and life threatening illnesses from the VAERS system

According to the website above, the data reported in VAERS, reproduced on the site, show that adverse events triggered by Moderna batches have varied widely.

5% of the batches appear to have produced 90% of the adverse reactions

Some Moderna batches are associated with $50 \times 10^{-5} \times 10^{-5}$ x the number of deaths and disabilities compared to other batches.

With that knowledge, I entered my batch code in the search box. The first injection had almost no significant adverse events associated with it. The second jab, frankly shocked me

Here are the results:

Now, I don't know how many doses are in each batch. But I do know my batch was most definitely in the top 5%. So, not really a surprise in retrospect that I had such a serious adverse event profile.

I always felt I was lucky that I happened to be going to my physician that day, who is also a cardiologist (she is my internist - so I wasn't seeing her for that specialty).

But just think- our government had this data way back when in the VAERs system -even last summer. This data is so compelling and yet...crickets. How many people could they have helped by releasing this data? People like me, who if I wasn't a physician and hadn't gone to my physician could have easily dropped dead.

What is wrong with our government that a site like this is not available from the CDC or the FDA?

If anyone has any doubts about adverse events from these vaccines, take a look at some of the peer reviewed research or look at the VAERS data for deaths in young adults and children.

People have the right to be given informed consent of risks and benefits of a medical procedure. Informed consent is not given, if the risks are hidden.

WHERE THERE IS RISK, THERE MUST BE CHOICE

Dr. Ardis' Video Interview

5fbc-ec11-996a-

The research done by Dr. Ardis points to the source of Sars-Cov-2 as being most probably Cobra venom. The Dead Sea Scrolls predict using snake venom to kill humans. Mrna gene therapy shots are being used to change our DNA. The research Dr. Ardis has done is very helpful in understanding the whole Covid picture.

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0050568299de&data=04%7C01%7Cwsboh%40sboh.wa.gov%7C3532caca29cd4ec5df1c08da1f7fd54a%7C

From: Lisa Templeton

Sent: 6/3/2022 11:39:20 AM

To: DOH WSBOH

Cc:

Subject: Public comments for the Board's materials for its June 8 meeting

External Email

Dear Board members,

Welcome to new members Dr. Love-Thurman, Ms. Oshiro, and Ms. Flores.

I am an ex-vaxxer, having learned the hard way after blindly following my children's pediatricians' advice for over two decades. No one had told me that vaccination poses serious risk, that the doctors and manufacturers behind these procedures are shielded from liability, or that the products are inadequately tested.

I've spent the last several years helping others become risk-aware, too, which I wish someone would have done for me.

The silver lining of Covid with its unprecedented government overreach is that my endeavor to educate others is being multiplied; the masses are waking up to Pharma's regulatory capture of public health. It's important for BOH members to be aware that the continued cardinal goal to get the experimental Covid "shots in every arm" and the suppression of prevention guidance and unpatented early treatments are undermining your credibility as people's own experiences increasingly diverge from the narrative. Like I did, they are learning the hard way, and they will never go back.

The public's faith and trust in public health is at an all-time low, and it continues to decline the harder the one-sided messaging is pushed.

People are becoming even more skeptical with the disproportionate recent publicity regarding monkey pox that seems intended to alarm listeners into clambering for more pharmaceutical products in order to "stay safe."

Would you consider redeeming your organization and restoring your reputation by cutting marketing ties with Big Pharma and focusing instead on informed consent and the promotion of true wellness and prevention measures that will improve the public health? You could begin by granting Mr. Harp's petition today to add language to WAC 245-105-070. This is your way forward to fulfill the dream I believe you had when you entered this field. Well-being and vitality do not come from a needle.

I thank you for taking my encouragement to heart.

Sincerely,

Lisa Templeton

From: Lisa Miniken

Sent: 4/30/2022 1:03:47 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Concerns regarding proposed policy for the Keeping of Animals

External Email

To whom it may concern,

As a member of the Backcountry Horsemen of Washington and as a property owner of a small horse property in unincorporated King County, I share many concerns with other people in similar situations regarding the proposed policy. Along with others, I ask that you delay the draft policy proposal and form a task force to hear concerns from many people such as myself.

I live in an area where acreage and hobby farms are slowly being phased out in favor of large homes and neighborhoods. Although my horse property is legal and setbacks are respected, I'm concerned about the vagueness of the current policy proposal. My barn is situated close to my neighbor's house so what if she complains about a smell, even though none exists due to responsible horse-keeping? What if another neighbor decides to complain because they don't like the "look" of horse property?

The current policy is too vague. Please take into account the reality of small livestock farms in the area and put some more thought into a proposal that will work for everyone.

thank you, Lisa Miniken Redmond, WA 206-399-7134 Fire way Marries Dalla

From: Morris, Della

Sent: 4/29/2022 1:52:46 PM

To: DOH WSBOH Proposed Animal Waste Rule

Subject: CR-102 Proposed Rule Alert: Keeping of Animals (WAC 246-203-130)



attachments\82A1C812159B4468_WAC 246-303-130 CR102 response.doc

External Email

Attached is the written comments on CR-102 Proposed Rule Alert: Keeping of Animals (WAC 246-203-130).

Thank you

Della Morris | Administrator II

Environmental Health Services Division

Public Health Seattle & King County

401 Fifth Avenue, Suite 1100 | Seattle, WA 98104

Phone: 206-263-9554, |Fax: 206-296-0189

Della.morris@kingcounty.gov <mailto:Della.morris@kingcounty.gov>

From Nangy the Coul Dancer

From: Nancy the Soul Dancer Sent: 5/10/2022 3:59:32 PM

To: Amy Bolen, David Wolbrecht, jarnold@kirklandwa.gov, Jon Pascal, Kathi Anderson, Kelli Curtis, kraymond@kirklandwa.gov, Kurt Triplett, Mayor Penny Sweet, Neal Black, Toby Nixon Subject: CDC's 5 + criteria for a pharmaceuticals qualifying to be labelled a "vaccine"

External Email

Hello Distinguished member of the Kirkland City Council and City Manager,

I am a concerned citizen, retired educator among many other roles I play.

My purpose in writing to the KCC is to ask you to consider some information that may not be readily available .

That said, the CDC has had longstanding criteria for a product to be labeled a "vaccine".

Here are the CDC's 5 original criteria for a vaccine:

- 1 .Has antibody immunity of the virus.
- 2. Must give protection from the virus.
- 3. Shows reduced hospitalization, reduced severe symptoms and reduced death.
- 4. Shows the stopping of the carrying of the virus.
- 5. Stops transmission of the virus.

The three COVID19 shots (Pfizer, Moderna and J&J DO NOT and DID NOT meet any of these 5 criteria, even though they all were purported by their companies, by Dr. Fauci, etc. that these were credible, safe and effective "VACCINES"!

Please note, that after a year of the rollout of these "vaccines", the CDC's then added a 6th criteria in order to be able to call these products "vaccines. The 6th criteria was for the product to have mRNA as an ingredient.

Please note: The physician, immunologist, creator of the mRNA technology, Dr. Robert Malone, has repeatedly spoken out in many venues across the country, to say this is NOT what the mRNA tech. was intended for and that the pharmaceutical companies have added other undisclosed, toxic ingredients which have made these "vaccines" neither safe nor effective!

Here is a short video, 6 min., of Dr. Robert Malone, the creator of the mRNA used in the COVID shots. If it is not safe for the children, it is not safe!

https://globalcovidsummit.org/news/live-stream-event-physicians-alerting-parents <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fglobalcovidsummit.org%2Fnews%stream-event-physicians-alerting-parents&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C9350f2b9463b4c204e2808da32d8bceb%7C11d0e3

Thank you for reading this far and for taking a few more minutes to watch this informative video (link below), with good independent science (that Big Pharm funded and controlled mainstream media doesn't share. Wonder why not?!)

Signed,

A mother, a grandmother, educator for 35 years.

P.S. Don't believe me, I invite you to do some independent research yourselves.

Full Text of Dr. Malone, creator of mRNA, Statement (Dec. 15, 2021)

My name is Robert Malone, and I am speaking to you as a parent, grandparent, physician and scientist. I don't usually read from a prepared speech, but this is so important that I wanted to make sure that I get every single word and scientific fact correct.

I stand by this statement with a career dedicated to vaccine research and development. I'm vaccinated for COVID and I'm generally pro-vaccination. I have devoted my entire career to developing safe and effective ways to prevent and treat infectious diseases.

After this, I will be posting the text of this statement so you can share it with your friends and family.

Before you inject your child - a decision that is irreversible - I wanted to let you know the scientific facts about this genetic vaccine, which is based on the mRNA vaccine technology I created:

There are three issues parents need to understand:

The first is that a viral gene will be injected into your children's cells. This gene forces your child's body to make toxic spike proteins. These proteins often cause permanent damage in children's critical organs, including

- * Their brain and nervous system
- * Their heart and blood vessels, including blood clots
- * Their reproductive system, and
- * This vaccine can trigger fundamental changes to their immune system

The most alarming point about this is that once these damages have occurred, they are

irreparable

- * You can't fix the lesions within their brain
- * You can't repair heart tissue scarring
- * You can't repair a genetically reset immune system, and
- * This vaccine can cause reproductive damage that could affect future generations of your family

The second thing you need to know about is the fact that this novel technology has not been adequately tested.

- * We need at least 5 years of testing/research before we can really understand the risks
- * Harms and risks from new medicines often become revealed many years later

Ask yourself if you want your own child to be part of the most radical medical experiment in human history

One final point: the reason they're giving you to vaccinate your child is a lie.

- * Your children represent no danger to their parents or grandparents
- * It's actually the opposite. Their immunity, after getting COVID, is critical to save your family if not the world from this disease

In summary: there is no benefit for your children or your family to be vaccinating your children against the small risks of the virus, given the known health risks of the vaccine that as a parent, you and your children may have to live with for the rest of their lives.

The risk/benefit analysis isn't even close.

As a parent and grandparent, my recommendation to you is to resist and fight to protect your children.

E D L DETERO

From: Bob PETERS

Sent: 4/29/2022 9:17:56 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Re: Animal Waste rule

External Email

This may not be an acceptable form for comment, but I'm surprised that there doesn't seem to be any mention of people keeping animals (poultry, etc.) in residential neighborhoods.

There are probably very few backyard chicken pens that aren't feeding as many rats as chickens.

Robert Peters Puyallup From: Phillips, Theresa (DOH)

Sent: 5/2/2022 4:04:28 PM

To: DOH WSBOH Proposed Animal Waste Rule Subject: Animal Waste Rule Comment Letter



attachments\9A9C64127A7F4A33_image001.png

attachments\946C792D5F414A6E_2022-05-02-SBOH-Animal Waste-Letter.pdf

Dear Board Staff:

I am submitting the attached letter on behalf of Lauren Jenks, Assistant Secretary, Division of Environmental Public Health, Department of Health.

Thank you for the opportunity to comment on this important environmental public health rulemaking.

Theresa Phillips

Regulatory Affairs Manager

Office of the Assistant Secretary

Division of Environmental Public Health

Washington State Department of Health

theresa.phillips@doh.wa.gov <mailto:theresa.phillips@doh.wa.gov>

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5 D I IV III N (CDOII)

From: Donahoe, Kaitlyn N (SBOH) Sent: 4/29/2022 12:06:16 PM

To: DOH WSBOH

Cc:

Subject: FW: Board Decision on Covid-19 Vaccines

From: Janet Young <antiejan@gmail.com> Sent: Friday, April 29, 2022 11:33 AM

To: Donahoe, Kaitlyn N (SBOH) <kaitlyn.donahoe@sboh.wa.gov>

Subject: Board Decision on Covid-19 Vaccines

External Email

After listening to all of the Board and TAG meetings, I am pleased with the thorough consideration of the need or not to vaccinate children in our state for Covid-19. I appreciate all of the time each member had to spend in their decision making.

I am very appreciative of the Board's decision not to recommend mandatory Covid-19 vaccination for Washington's school children. This is a very serious subject that parents need to ponder and make a decision for their own children. We do not know the long-term effects of this vaccine in children.

Sincerely,

Janet M. Young

Maple Valley, WA

April 29, 2022

From: Yukari Endo

Sent: 4/14/2022 9:54:15 AM

To: DOH WSBOH

Cc:

Subject: My great uncle passed away with Pfizer forced mandate third booster in Japan

External Email

To Washington state board of health

Please read this message and take it serious to upcoming meetings if you still push us mandate mRNA technology in WA.

The decision you made on no to school mandate is commonsense. We have been speaking out to reach to you all since the closure.

My name is Yukari Evins. I have been living in Washington for total 23 years now. I was living in Seattle king county for 22 years. I'm from Japan.

I wanted to comment on the zoom public meeting yesterday but I wanted to respect other doctors and medical professions and educators to speak out so I was marked no on the comment for the meeting yesterday so they can speak for all of us clearly.

If I could leave a public comment yesterday, I wanted to tell you all including the Washington state residents on zoom that my great uncle passed away with the forced mandate shots by senior facility in Japan.

He was passed away last month in Mar 15th that happened three days after the forced so called mandate shots done by the senior facility in Japan. We are currently under investigating related to his death.

As the doctor found out that there are tremendous amount of blood clots in his body.

He did not want to get the shot as even if he was 97 years old, his entire life was blessed in such perfect health without taking any meds at all but this Covid mandate forced restriction killed his life.

Some people might blame on his deaths as he was old but the fact is that he was dead within 72 hours after being shots.

This is my point to claim on so called specialists of advisory or doctors on media keep recommending or forcing mRNA shots in the world. What kind of world it is. None should command on Others body and health at all.

I'm Very sad about my great uncle's death by experimental mRNA.

As soon as he was forced to get the first Pfizer shot, he started to feel sick and they forced the second shot last year. Then his organ started to fail as became very ill. But the facility again forced to shot him in third booster last month and then within 3 days, he was dead.

We all know that there is such wrong moral and against humans since the closure that has been always pushed to us by using the name of "For your safety" Anything is convenient to be used to control people.

Crucial point that people have to know is that It is communism under the name of Covid 19.

I'm very upset and angry at the same time very sad about my great uncle's death as I have been speaking up not to get the experimental shots by the Gov or the foundations and big Pharma in the world and now tech has been controlling the entire world since the closure of so called Pandemic by media and all the gov in the world.

Are they trying to kill all of us ?!

By forcing or mandating this experimental shots that we have no idea of the long term side effects.

Why we have been pushed this experimental mRNA that have killed already tremendous number of people in the world including my great uncle? To kill many people?!

The session that you made not to mandate to school kids in WA is commonsense. It is not anything special about the decision by the Washington state board of health.

I want to thank you all of doctors and medical professionals and educators and fire fighters, Sheriffs, police officers, and all the parents.

Our voices have never been on reported by media but always marked us as anti Vaxxers.

We are not anti Vaxxers but know what is happening in the society.

people who only watch media that was given tons of foundations by only the portion of people or organizers believe in the media only and continue getting endless boosters.

Hope that the Washington state board of health will not being pushed by the any foundations and alliances to push kids' mandate again so you have to listen to them and controlled by them by ignoring our voices.

I all agree with all the public comments yesterday and none of us agree with the forced shots as we know that this is something very bizarre and sketchy.

We would like also ask not to use zoom meeting anymore but requesting go back to the public meeting in person.

Yukari Evins

Thanks

It has been happening not only

video%2Fid646100661&data=04%7C01%7Cwsboh%40sboh.wa.gov%7C7ff1d0c1a48d4927b31408da1e37

From: Geri Rubano

Sent: 6/1/2022 11:14:32 AM

To: DOH WSBOH

Cc:

Subject: Covid shots

External Email

Dear BOH,

I want to thank you all for not adding the Covid-19 shots to the mandatory shots for children to attend school. It is my hope and prayer that this injection never makes it to the list of vaccines required for school entry regardless if there are exemption options for parents.

I find it disheartening and more than surprising that you have ignored the thousands and thousands of adverse reactions and deaths reported to VAERS that these shots have caused the American people. The "science" that most physicians are following that claim these "vaccines" are safe and effective is flat out wrong and corrupt.

Please continue to listen to the outcry of the citizens and taxpayers of this state who say, "NO" to these shots.

Thank you,

Geri Rubano

From: carol fields

Sent: 4/30/2022 2:49:13 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal Waste Rule

External Email

please delay the Draft Policy proposal in June and that a work group/task force is formed to vet out our concerns. if this proposal is passed, I am voting to move my paycheck (and most of my horsemen friends also) out of this state. We have had enough. Carol Fields Graham, WA

Fight organized crime: Re-elect no one..

From: Neal Padur

Sent: 4/20/2022 3:50:03 PM

To: DOH WSBOH, DOH Secretary's Office

Cc:

Subject: Thank You for Listening to the Citizens of WA State

External Email

Dear BOH Members: Thank you for listening to the concerns of us as citizens of Washington State and for voting to adopt the TAG's recommendation to not add the COVID-19 vaccine to Washington's list of required immunizations for child care and school entry at your April 13 virtual public meeting. We are confident that the emerging scientific data will continue to affirm your decision. Thank you for your thoughtful consideration in your role to protect the health of the children in our State. Our family were preparing to sell our home and move to another state. Respectfully,

Neal & Linnea Padur

France Maliana Manay

From: Melissa Moser

Sent: 5/17/2022 5:58:59 PM

To: DOH WSBOH

Cc:

Subject: Covid vaccines and safety concerns for children

External Email

Hello,

Thank you for all you do and your consideration with this information regarding Covid vaccines and safety concerns for children:

 $https://childrenshealthdefense.org/defender/fda-pfizer-booster-kids-third-dose/?utm_source=salsa\&eType=EmailBlastContent\&eId=36fce1ce-6d54-498b-9eaa-62c972c8166c$

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fchildrenshealthdefense.org%2Fdepfizer-booster-kids-third-

dose%2F%3Futm_source%3Dsalsa%26eType%3DEmailBlastContent%26eId%3D36fce1ce-6d54-498b-9eaa-

62c972c8166c&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C87006fa1f8a34dfd938508da38698d15%7C

Sincerely, Melissa Moser

From: Melissa Moser

Sent: 4/23/2022 5:07:17 AM

To: DOH WSBOH

Cc:

Subject: Fwd: Covid vaccines and safety concerns

External Email

□Hello,

Thank you for all you do and your consideration with this regarding Covid vaccines and safety concerns:

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fchildrenshealthdefense.org%2Fdefe vaccines-meager-benefit-young-kids-cdc-report-shows%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C464ffd0e3e3143712a4508da2521abb9%

Sincerely, Melissa Moser 5 Al D:

From: Alynne Prins

Sent: 4/30/2022 12:06:29 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: 5D3224B3-3671-40FD-81AF-080FF8EC72D1

External Email

Please postpone draft proposal from June's hearing and allow a work task force of stakeholders to convene and sort out concerns.

Thank you, Alynne Prins Livestock Owner, Snohomish. - C | | | | |

From: Gerald Braude

Sent: 6/2/2022 11:36:22 PM

To: DOH WSBOH

Cc:

Subject: COVID-19 shots are not safe

External Email

Dear members of the Board of Health:

Thank you for voting unanimously for not adding the COVID-19 mRNA gene therapy shots to the school entry requirements. Thanks to your vote, parents are not faced with the predicament of subjecting their children to these Emergency Authorization Use experiments for school entry.

During your last meeting, many of you stated the shots are safe, one saying that his three children have been fine after taking the jab. That's nice that the shots worked for your family but try telling that to the family and friends here of the seven-year-old boy who died after the shot or the seventeen-year-old girl who died after the shot or the two children whose mother--Jessica Wilson Berg--died after taking the shot so that she could be a classroom mom. All these deaths were of Washington residents.

Or try telling the shots are safe to the family and friends of those 202 here in Washington who died after taking the COVID-19 shots. The Vaccine Adverse Events Reporting System on the Center for Disease Control web site has those figures. Or try telling the shots are safe to the thirty-five children who have been diagnosed with myoperidarditis from the Pfizer shots at Seattle Childrens' Hospital. This type of condition is serious.

Just the above figures in themselves show that the COVID-19 shots are not safe and please keep this in mind when making future decisions concerning these jabs.

Thank you for all you do for Washington,

Gerald Braude Port Townsend ______

From: Garry Blankenship Sent: 4/28/2022 8:23:39 AM

To: Cc:

Subject: Unexpected Deaths

External Email

https://rairfoundation.com/epidemic-german-and-austrian-mayors-under-60-aresuddenly-and-unexpectedly-dropping-dead/ <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Frairfoundation.com%2Fepidemic-german-and-austrian-mayors-under-60-aresuddenly-and-unexpectedly-dropping-dead%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cc908ac825e6d4c39ad4308da292b07ee%7C11d

When one adds to above the surprising number of super athletes dropping in their prime, insurance company statistics of a catastrophic increase in middle age deaths and the alarming number of various not yet lethal harms and maladies, it is clear that these experimental mRNA drugs are the cause. Anyone in the health management system that pushed these drugs should not only be troubled looking in a mirror, but should be held liable. They are the "professionals" and their promotion of these drugs is both incompetence and malpractice.

From: lourie boltz

Sent: 4/26/2022 10:52:47 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal Waste Rule

External Email

Please delay the ruling of this issue so more discussion and information can be pursued. There is much more fact finding and possible solutions that must be reviewed in fairness to the thousands of urban and rural animal owners. As a responsible horse owner and member of Back Country Horseman of Washington this is very important to me.

Best regards, Lourie Boltz From: davissons

Sent: 4/21/2022 10:47:03 PM

To: DOH WSBOH

Cc:

Subject: covid vaccine requirement consideration

External Email

As you are considering whether to add Covid vaccinations to the list of required vaccines for school children, I would urge you to consider the many reasons this vaccine should NOT be added to those required vaccines for children.

Vaccines are, under normal circumstances tested for 5-10 years before being released to the public. This allows time to test short term, as well as long term effects. Vaccines are also normally tested on animals during the testing process. Because the MRNA shots were fast tracked, animal testing was not done and neither was long term testing. As such, there are still many unknowns, including any possible long term effects. Also, because of the fast-tracking, the public has become the long-term test subjects. As was admitted during FDA approval process for kids, the results won't be known until kids are getting the shots. Is it morally right or fair to force children to be test subjects? Adults have a choice. Children do not.

Secondly, we do know that there have been many cases of myocarditis and pericarditis, mostly in boys and young men, and in some girls as well. The CDC has claimed these, and other serious effects, are rare. But I encourage you to check the websites realnotrare.com and c19vaxreactions as well as VAERS and you will see thousands of heartbreaking stories of lives forever changed from unexpected serious effects of the vaccines. Parents have lost healthy children to heart attacks, and some have previously healthy children who are now having seizures, suffering debilitating pain, serious gastrointestinal problems and even some who have had strokes and others, wheelchair bound. How many hundreds, or thousands, of children must suffer these reactions before adults stop this? No child should have to be forced to play this game of Russian Roulet, not knowing if they will be one whose body reacts in a way that will forever change their life, or take it from them. In addition to this, we don't know the long term health effects of this shot. It is known that the spike proteins have been found in all the organs, it is known that they can pass through the blood/brain barrier, and it is known that they can attach to the blood vessel walls causing damage and blood clots. What could it do to these small bodies, including their reproductive organs, to their brain, and other organs? Many have their opinions. But the truth is, no one knows.

Third, for the vast majority of children, Covid 19 symptoms are very mild. Survival rates are almost 100%...99.998. What purpose does it serve to require a shot with the health risks of this one for a virus that all agree, is not deadly for children. If it is to protect the adults...when have we ever forced kids to get a vaccine to protect adults? That would be wrong on many counts. And aren't adults able to protect themselves, if they choose, with the vaccine?

Lastly, now that boosters are out, and soon, shots for Omicron, when will this end? Will our kids be required to get boosters every 4-6 months as the shot's effectiveness wears off? Will each new variant require a new shot? Covid, with ever changing variants, may be here to stay similar to the flu. Flu shots are a choice. Some do it, some are not comfortable with it. It should be each family's decision to make.

Many countries are realizing that with all the vaccine mandates, it's not working to stop this virus, so are stopping the vaccine requirements. Unlike normal vaccines, covid vaccinated people still get covid, and transmit it. I strongly urge you to take a look at the sites I referred to and see the truth about the many children and teens who have been harmed by these shots. Brazil recently stopped vaccine requirements when a young girl died of a heart attack shortly after getting the vaccine. Although the data recording in America during covid has been disturbingly lax, records and testimonies show that we have had many more than one child's death and serious adverse effects....surely

Washington State, and all America, cares about these lives, and will be wise about not putting more children in jeopardy, as Brazil did, and other countries have as well. Please make this decision based on real things happening to real children...and the many more that could be hurt if this shot were to be required. There are so many conflicts of interest among agency's advising people on what to do. Isn't it time to listen to the people it affects? On a side note...I know a pediatric nurse in a large hospital, where not one child has died of Covid...who is very much against kids getting the shot. There is also a respitory therapist in the family who is very much against the shot for kids. She recently cared for one who almost died of a heart attack. And both of these health care workers are vaxxed... but are against putting children's health and life in jeopardy with a vaccine that they say is more of a health risk for children than if they were to get the virus. Please do the right thing for the children of our state and say no to our kids being nonconsenting long-term test subjects for these vaccines. Sincerely,

Jan Davisson

Sent from my Verizon, Samsung Galaxy smartphone

From: Bobette Knapp

Sent: 4/27/2022 8:37:04 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Keeping of Animals - Comment

External Email

I am requesting that you postpone the draft proposal from June's hearing to allow a work group/task force of stakeholders to convene and sort out the concerns. Among those many concerns are mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officer), and more.

Bobette Knapp

Orting, WA

Horse Owner

BCHWA Member

From: DOH WSBOH

FIGHT: DON WSBON

Sent: 6/3/2022 4:27:42 PM

To: DOH WSBOH

Cc:

Subject: Public Comments

From: Only Better <obetter370@gmail.com> Sent: Thursday, May 5, 2022 11:17 AM To: DOH WSBOH <WSBOH@SBOH.WA.GOV>

Subject: NEW MEDICAL PHENOMENA: This horrible reminder of Holocaust has been reenacted in Seattle by North Koreans and some stray, yet well-protected, dogs of today's America, and they've been acting like they owned a whole city and law

enforcement agencies by ...

External Email

Havana Syndrome and Nazi-style Criminal Human Experimentation in Seattle by Koreans and "Greenland" Nazi cult group

Dear Sir or Madam:

My name is Sonya Hyun. I'm sending this letter along with a brief description of my current life situation, which, I believe, heavily implicates the abusive employment of BCI Technologies -- nightly dream insertions, constant monitoring of my biofeedback data, brain mapping, thought reading and optical scans, and memory downloading/uploading. Calling it a "memory uploading," they've been forcing two dreams each night, largely fake dreams of illicit contents -- portraying me as a drugtrafficker or as a prison inmate beaten up inside a jail. They were mostly manufactured by themselves during the day, stored at the back of my head, nightly played during my sleep, and then those dream images were uploaded somewhere (now with my image included in it by the next morning). Casually discussing exchanges of memory and DNA between two people, an American supervisor (a self-claimed journalist well into her 70s-80s) ordered a mysterious group of Koreans, to use dream insertion memory uploading techniques and memory downloading from Hippocampus. Such was done for the purpose of exchanging memories (and also body parts) between myself and a 45-year-old Korean woman (an illiterate person with multiple prison records).

During the week of 3/6/22, one of the Korean group said, "There has been an inquiry from Minister Kang, Gyung-hwa (the former Minister of Foreign Affairs of South Korea), and we've just been ordered to remove all evidences at once." Afterwards, more of them have made a forced entry to my home with more harassment schemes -- e.g. flipping over cooking pans inside the oven, spilling foods all over, or creating an electric fog of high voltage inside my unit. On 3/24/22, a Korean male in his 40's answered his female co-worker, who was questioning his backup plan for the continuation of this program:

"I'm plotting to dump her in a mental hospital. The preparations are almost done. Except that Minister Kang has thrown some muds over my otherwise well-planned scheme. We've already had too many witnesses. We have to kill them all."

On 4/10/22, a 45-year-old Korean woman confessed that she'd been ordered by her boss in Korea to present me to others as a low-class woman by lowering the quality of my life, and then to spread a rumor that I had been an adopted orphan, not a real member of my family of origin. For that purpose alone, the group has been blocking all accesses to cultural venues -- for instance, by shooting toxins to blind my eyes in order to prevent me from reading. Alternatively, I have found myself unwittingly providing maid services for the entire group of Koreans -- cooking, laundering, toilet cleaning, etc. (In the morning of 4/29/22, I was awaken by a Korean woman demanding cleaning services.) For the past 27 months, they've been disfiguring and damaging my facial and bodily parts in the name of 'plastic surgery.' They have been molding my apparances into those befitting a person who had grown up in the street as an orphan and had later become a drug dealer living in and out of prison.

More and more, it seems that it is what the group has been experimenting upon, that is, to "reverse," by reversing the personal traits and backgrounds of two opposite types of people in an opposite direction. After many failed attempts, on Easter Sunday (4/17/22), the group was ordered to erase my memory altogether in order to create better receptivity for a new one. On 4/27/22, the group discussed about their overnight failure in performing brain legions surgery (by using non-invasive "invisible" technology that had been administered by a self-claimed Korean Naval Officer) on the top part of my brain. By doing so, they were trying to obtain sufficient materials for the creation of an exact replica of my body and mind. In fact, I woke up in the morning feeling bumps all over my frontal brain area. Enough of horror for me, but as casual as ordering a cup of coffee for this mysterious group of Koreans. On the same day, the group warned one another to watch out for the thermal cameras possibly monitoring their movements from unknown sources outside.

Furthermore, I had spent more than 5 years of my life, homebound and utterly devastated, from the aftereffects of vertigo that had occured seconds after hearing a mysterious sonic sound one night (later, I got a help from internet instructions for rebalancing inner ears). In addition to their tech gadgets, there's a hint of occultism practiced here, as indicated by their invisible mobility (their presence only evidenced by their excessive toilet usages, the amount of foods stolen on a daily basis, and bodily injuries inflicted on my body, especially in my ears, brain and spinal cord), their periodic shamanic chanting, and seeking guidance from Oracle. Additionally, for some unknown reason, the group addressed my son's circumcision as an issue of contention, and determined it to be a part reason to continue their experiment on our family. Throughout the program, they continuously schemed to cause a rift between mother and son by use of technology, gaslighting and other trickeries. I hope that your awareness of this situation will bring about more fruitful and ethical environment in your area of concern, as well as for many who are suffering silently. Thank you in advance. Peace be with you.

mature age, I have decided to share the story with you. Below, I have briefly described what I had witnessed during the past 45 months.

I would like to draw your attention to the following matters:

1. I reside in 7720 Greenwood Ave., Seattle, WA 98103, right above a commercial unit leased by Illumination Learning Studio (Children's Daycare Center.) I am a single woman of Asian background in her mid-60's. After accumulating some experiences in homemaking, literary translation and community services, I have finally settled down in stocktrading for income, in order to utilize my doctorate training in mental health, free of financial concerns. For some unknown reason, during the past 11 years, all of my endeavors to contribute to my well-being and that of our community have been systematically and persistently sabotaged by the said group of mysterious nature. Despite their interferences, I had been able to generate a small income to cover my bill payment and to participate in community, until this group forcibly intruded my home approximately 4 years ago.

Presently, all of my routine activities -- income generation, interpersonal and community outreach, and daily walking and exercises -- have been reduced to null, because of their persistent criminally-oriented disturbances (e.g. shooting multiples of tiny marbles at my back in the middle of walk that induced symptoms mimicking heart attack, or torturing the lower back area of my brain whenever I socialized with others, or using my bank account login info in their numerous attempts to empty my account at night.

2. In August, 2018, ILS invited a group of multi-racial (largely Koreans) "entertainers" for a 2-week non-stop chanting sessions. Afterward, Mr. Michael Piper (the owner of ILS) instructed the group to "make a lot of noises" from the walls (in order to drive me insane), and then the group started an on-going surveillance through the wall units throughout my condo. Calling it Bathroom Ridicule Game, they positioned their surveillance equipments to occupy all bathroom walls, and incessantly made fun of my naked body parts in the bathroom. (For instance, a Korean girl named Rachel called for others to join in by laughing out loud, "She's cleaning vagina.") I also overheard them talking about the possibility of using the Satellite surveillance technology from a distance. The group displayed an out-of-reality mentality, by addressing me as a 'human sacrifice,' and by scheming to 'confiscate everything' at the expense of my life.

During the past four years, they have used electronic brain torture, microwave heat torture, incessant insect bites of various kinds, and bladder/vagina/rectum stimulation. More importantly, they have been disturbing my sleep by employing nightly electric shocks, and dream insertions (often with a form for me to provide my Social Security Number in). In April, 2019, I became very ill and went into projectile vomiting all night long, losing 8 pounds overnight. When I finally recovered from the illness, I heard the group reporting to their superiors that it had been caused by arsenic rat poisoning slipped into my food at the previous night. Their superior (an elderly American male) then responded, "She's resilient."

Up to now, I have gained more than 100 visible scar marks due to nightly stabbing and biting from top to bottom of my body. The Korean-speaking group also engaged in nightly violation of my private body parts by crawling under my blanket and intruding my body in the form of parasite.

They have also sent Korean-American orphan girls (initially Clara and Rachel, and later two other Korean girls, 24 and 45 of age) to live in my unit, partly in order to infect me with Gonorrhea virus -- by ordering a 24-year-old Korean girl with gonorrhea virus to submerge in my bath water while bleeding in her menstrual period -- and partly for the purpose of disabling my daily functioning -- by means of painful torture, constant harassments at the sight of food, and invasion of privacy with criminal intent. Nowadays, all Korean females (currently, minimum 5 of them) have been ordered to mix their urines and saliva with those of mine as a way of mixing their DNAs with mine. As a result, their urines, sometimes their feces, have always been sitting in my toilet bowl, unflushed, at all hours for the past eight months. Even though I cannot see them, I can still hear them jumping around, knocking things down, and constantly discussing about which food or clothing to steal from my home. Until recently, I was forced to clean up after their messes -- finding fingerprints of various kinds (those of human adults and children, animal pawprints, or elongated nail prints without a thumb, etc.) on the edges of fridge doors.

Furthermore, the said group has filmed on-going sessions of tortures and harrassment scenes in the name of Murder Mystery Reality TV Series, and has regularly invited young audiences for its viewing. One of the ILS female employees even cheered their guests by saying, "You have to watch it. It's really, really fun to watch it." Nowadays, they're filming "everything" under the instruction of an American female in her late middle-age.

- 3. What has led me to suspect their other-worldly nature were:
- A. The ability to intrude my upstairs unit from their downstairs commercial unit through walls -- for instance, walking to and from my dinner table (I can only see their moving footprints on the carpet while they're walking away,) and then disappearing through closed glass doors of fireplace, still spilling food all the way,
- B. The ability to invade a zippered bag in order to steal IDs, credit cards, bank documents and diary books, and to copy all stacked items and pages as seen in 3-D printing. For instance, I heard them reading aloud my personal journal, email correspondence, or my childhood photos, and discussing their contents, while they were still in my possession.
- C. The ability to jump into boiling foods and beverages and consuming them with noisy gulp directly from stoves, or biting off an apple and eating its meat aggressively without breaking its skin (clearly audible only through the speaker of my phone),

- D. Their transformation into a form of tiny parasite or worm when consuming foods and liquids but in the amounts of too large for their sizes, and their tendency to nibble on my fleshes and drinking blood with loud noises, and to crawl into my organs via private body parts (while still communicating in Korean language with one another, such as "Don't move," "Penetrate," or "Get out"),
- E. Their violent reactions to either Sage burning or Peroxide spray,
- F. Their employment of 'humming' technique for the purpose of healing or recovery from weakened physical state,
- G. Their humanly impossible degree of evilness in their thoughts and behaviors, continuously plotting murder schemes and torture ideas as casually as breathing (For example, a 45-year-old Korean woman has been leading a parasitic lifestyle, living off my home for the past 11 years -- wearing my freshly laundered underwear and tossing them back unwashed, indulging foods from my kitchen all day, and defecating in my toilet several times a day without cleaning it once. During her prolonged stay, she relentlessly tortured my brain, ears and spinal cord in a sadistic manner, and wrecked my life ruthlessly. Instead of showing a sign of guilt or remorse, she's still maintaining her belligerent mindsets and behaviors, saying "You little mouse trapped in a jar," "You cursed life, everything's taken away from you," or "I'd be glad to occupy her body, and I want to have everything she has,")
- H. Their ability to follow me around (invisibly) everywhere, be it a bookclub meeting or a bank, and to report back to their bosses regarding who I met, what I discussed with others, how much I spent, how much my bank balance showed, and what I typed in my cellphone, not to mention my bank account numbers, pin numbers and email passwords,
- I. Their unusual surveillance technique -- one person turning on a switch using a cell phone from a parked car, and the other climbing up my street-side windows invisibly (but still making visible dents in the windows), often shouting, "higher, a little higher," (Afterward, the former exits the car and returns to ILS, while the latter remains attached to my window for surveillance and for electronic torture on my brain.)
- J. Their mysterious changeability in their apparence -- For instance, while I was strolling in my neighborhood, I spotted a skinny-faced Asian woman about a quarter-block away taking a photo of me. When I got closer to her, her face turned into a round-faced Latino woman, to my surprise. I quickly captured her image in my cellphone anyway, only to learn later that my initial impression of her apparence was correct. A few hours later, while being charged, my phone died permanently,
- K. Their total reliance on mimicry in whatever they do, even in the choices of music for

their humming practices or foods that they eat, and their obsessive attempt to instantly download someone's brain power instead of working for it themselves, and

L. Their discussion about how to steal corona virus strains from hospital labs and spread them throughout the U.S. sky, and their employment of "alien" language -- spoken in an ultra-high speed -- when communicating with their higher-ups,

For the past two and a half years, I've learned the following matters:

- 1. The Illumination Learning Studio (children's daycare center) has been collaborating with Japanese-Korean gangsters (addressing their boss as 'o-ya-bong), though they had outwardly identified themselves as diplomats from Los Angeles, Hyundai Merchant Marine executives, professors from Korea, Navy lieutenants, or KCIA Intelligence officers,
- 2. The group is in possession of high-tech equipments, which have been used as tools for intrusion, torture, 24-hour surveillance, mind-reading, dream-insertion, as well as for their attempts to introduce Alzheimer's, heart attack, serious lung diseases, blindness, spinal cord injury, infectious diseases, facial and bodily disfigurement, premature aging internally and physically, incubation of their parasites in their host's umbilical cord -- all of the above physically experimented in my body, and
- 3. The group has been protected and supervised by numerous middle-aged men and women, both Americans (mostly blond or silver-haired) and Koreans (some with North-Korean accent), who do not seem to feel awkward at all about watching through my bathroom walls and making comments about my naked body parts. In fact, their American supervisors have consistently displayed an extreme degree of racism, by treating me as a lab animal for them to experiment "to the end" with no sign of remorse on their part, and also by labeling their Korean counterpart, "Subhuman Categories" or even "These Dirty Koreans."

The group initially started the program in 2018 with the intention to induce Alzheimer's in my brain by "messing up inner ears" -- the exact words used by one of the Korean group members named Rachael -- and then to force me out to the street as a homeless woman and at the same time to drive my son to suicide (according to the confession made by Max, an African American male technician of the group, who, I believe, later suicided himself, after Rachael's body had been carried out for organ donation by Michael Piper in his cream-colored van with ILS logo on it.)

In early September, 2021, I overheard a 45-year-old Korean female (who had been the most sadistic torturer throughout the program) reporting to her superior, "Jiyi (the same first name shared by my niece and CEO of Hyundai U&I), it's all over now. We've got exposed." Within the next 48 hours, her immediate boss arrived in Seattle, and, without

delay, spreaded a rumor that my finger movements were unusually clumsy, seemingly implicating cognitive degeneration. That night, I happened to notice a water pouch developing in the palm of my right hand, whose color turned from red to black overnight. Prompted by my nail, it fell off to reveal its external nature and my skin underneath it intact. On 1/14/22, the same individual informed her co-workers that she had expended all of their available funds for repeated briberies offered to the law enforcement and other Americans involved in the program. On the same day, a Korean male in his 40's -often speaking in North Korean dialects, living with a daughter aged about 10, posing as a Naval Officer, and acting as a mastermind behind the program -- persuaded the group to stay. He reminded them: "The Chairperson, Hyun Jungeun, rescued our lives. We owe her that much." In the early morning of 2/2/22, the same person reported back to his coworkers: "I couldn't get into the facility(?), because the entry was blocked by iron fences." On 2/4/22, an overnight visitor to ILS was horrified at the news of unruly behaviors displayed by the Korean group -- urinating casually in the living room, incessant brain torture for 24 hours, ongoing nightly burglaries, multiple Korean girls scooping up foods directly from our dinner table, etc. Upon hearing his complaint, a Korean female supervisor in her 30's defended the group: "They are Psychological DV's. They are protected." As of 3/1/22, the 45-year-old Korean female, mentioned above, urgently requested, to an unknown American female supervisor, a formal status as a North Korean asylum seeker in the U.S., after she had watched me frantically searching for the email addresses of National Intelligence Services of South Korea (the very agency that she had previously claimed to be agent of).

All throughout the program, they discussed: murder, false diagnosis of schizophrenia by use of bribery, and covering up someone's embezzlement -- first by eliminating me, then framing me for embezzled funds by using my identification information and forging documents. (They have in their possession all copies of my financial and personal documents except Social Security Card, my official signature, plus my finger and palm prints, and the closeup photos of my irises, not to mention multiple videotapes featuring my sleeping face, and my private parts while using toilet, which they view during the night.)

The owner of ILS alone, who used to be called Chicago Boss in 2010 by his recruits in the streets of Pasadena, California, had specialized in identity thefts and spy training, and had lured the unemployed people of various ethnic backgrounds, by advertising, "If vou're really, really good, vou'll be sent to Korea." After enduring a year of having been a main object of their spy training (mainly focused on surveillance and sabotaging techniques), I finally sent an email report to FBI Los Angeles Branch in January 4, 2011, describing their surveillance activities of criminal nature, such as trading their illegallyobtained creditcard information in an underground market, in my Old Pasadena neighborhood. Within a few days, I was no longer their training object but became their sole object of harassment, severe enough for me to ditch my California home and escape to Seattle in 2012, only to find them again in 2013 setting up a shop right below my condo unit in Seattle. A female recruit in her late 30's from Los Angeles (driving a maroon-colored SUV and carrying two guns in holders) not only successfully blocked my emails to DHS and FBI, but also managed to pretext my bank account in order to transact money transfer to their account. Borrowing their own words, the ILS group has "Octopus hands," reaching far and wide throughout the Phinney Ridge community of Seattle, Washington.

On 3/27/22, while engaging in light treadmill exercise, I felt a sharp pinch in my right arm. Within a couple of hours, the size of my arm expanded to 1 1/2 times its normal

size in width, with red patches all over. By the next morning, its skin texture has noticeably thickened and roughed to feel like that of an alligator. From its pores, a variety of black-colored substances spilled out -- tiny thorns and grains, and thin tapeworm-looking creatures with segmented bodies. Soon, other limbs were developing a similar symptom, but in a lesser degree, with the help of a magnet placed on the spots where the sharp pinch had been detected. When the owner of a silver-gray SUV with license plate 'BTS3243' (an American female in charge of this monstrous experiment) visited ILS in the afternoon, a 45-year-old Korean woman reported to her, "I put my right arm in her, but ..." Since then, for the next two weeks (until I finally regained my arm), I experienced a symptom mimicking that of minor stroke in my limbs on six separate occasions. I photographed the most affected limb, and tried to consult our local online medical community, but they kept blocking all of my emails containing those photos. I'm afraid that I'm dealing with an alien technology here, though I wish not.

Thank you very much for granting extraordinary patience by reading my email this far. Thanks, again.

From: Carly -

Sent: 4/22/2022 5:32:51 PM

To: DOH WSBOH

Cc:

Subject: THANK YOU!!!

External Email

Thank you for not requiring the COVID vaccination for children. I'm sure there was plenty of pressure to do so, but I appreciate that you have left this decision in the hands of parents and not forced them to make a decision to vaccinate if they do not believe it is in the best interest of their children. Thank you for allowing children to continue to participate in activities such as athletics without having to be vaccinated. The damage the last two years have left on all of our children in large part because regular activities were suspended is enormous. Thank you for not adding to the trauma and turmoil for families, as well as taking into consideration all of the information that we now know about who is most at risk for severe disease from COVID.

Sincerely,

Carly Greenland

From: Verna Sent: 4/29/2022 10:31:17 PM To: DOH WSBOH Proposed Animal Waste Rule Cc: Subject: animal waste
External Email
Hello,
Please delay the Draft Policy proposal in June so that a work group/task force is formed to vet out BackCountry Horsemen's concerns
Thank you for your consideration of this,
Verna McLeod

From: william sawaya

Sent: 4/21/2022 1:32:16 AM

To: DOH WSBOH, DOH Secretary's Office

Cc:

Subject: Thank You for Listening to the Citizens of WA State

External Email

Dear BOH Members: Thank you for listening to the concerns of us as citizens of Washington State and for voting to adopt the TAG's recommendation to not add the COVID-19 vaccine to Washington's list of required immunizations for child care and school entry at your April 13 virtual public meeting. We are confident that the emerging scientific data will continue to affirm your decision. Thank you for your thoughtful consideration in your role to protect the health of the children in our State. respectfully,

From: Colen Corey

Sent: 3/30/2022 7:17:54 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Manure flushed down from horse boarding facility



attachments\0B48A2A5B7304F51_image3.jpeg
attachments\E6726E356DB34E7E_image2.jpeg
attachments\43ED736001A44052_image4.jpeg
attachments\409F938C3601456A_image1.jpeg

External Email

Good morning

I'm glad to see this proposal especially for regulations and CPU for horse boarding facilities that have tributaries or wetlands on the property. I have contacted you before of large amounts of horse manure flushed down onto our pastures from ARD horse boarding facility. The seasonal tributary to little Anderson runs through their property and travel through 3 of our pastures. I remove all trace of manure each day on our property and we do not put any horses or cows in pastures where the seasonal tributary flows, mainly from late October to around this time.

I am in constant contact with the Health District and WA ecology on this matter along with the Conservation District so called "farm plan".

Most farm/ranchers are excellent care takers of our streams and create sustainable farming/ranching, but those who blatantly disregard or have no respect only amounts of money to be made make it hard for those who follow rules.

Thanks for putting this on the docket and helping neighbors to these abusers have a legal right to clean water flow onto there property.

What will be the legal fines? The people that do these things need to be accountable. Respectfully

Joanne Corey

360,633,6699

Sent from my iPhone

F DOODOUM I II

From: PCCBCH Memberships Sent: 4/27/2022 12:36:47 PM

To: DOH WSBOH, wsbohproposedAnimalWasteRule@wsboh.wa.gov

Subject: Public Comment - Keeping of animals

External Email

There are many issues/concerns that are unresolved from the last meeting on Monday the 26th of April. I am requesting that you postpone the draft proposal from June's hearing. I suggest that you allow a work group/task force of stakeholders to convene and sort out the concerns of this draft proposal.

Among the many concerns: mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officer), and more.

Please consider these concerns about the "Keeping of Animals" issues.

Thank you,

Ron/Barbara Downing

253-312-1072

Sent from Mail

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%6">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%6">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%6">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%6">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%6">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%6">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%6">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%6">https://gcc02.safelinks.protection.outlook.com/?url=https://gcc

From: Stephen Puskorius Sent: 4/23/2022 10:58:52 AM

To: DOH WSBOH

Cc:

Subject: Commit to no COVID vaccine mandates on children

External Email

Dear Washington State Board of Health,

I urge you to accept the TAGs recommendation and choose to NOT mandate covid vaccines on our children. Our state government should NOT be mandating Covid vaccines on our children. They are at extremely low risk for Covid and these medical decisions should be left in the hands of parents and their family doctors.

Sincerely,

The Citizens of Washington State

From: Sandra Brabant

Sent: 4/27/2022 10:53:32 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Proposal

External Email

I think this a great idea, if there is adequate support. In my area there is no cost share availability, nor any place that takes waste. I worked with the conservation district in my area and they gave me plans for an appropriate size compose bin. The cost to build was \$15,000. That didn't include anyway to get the manure out, or anyplace to put it. I have spent at least 25,000\$ for a containment area, compost bins, and small tractor. I still at 57 years have to spread it myself. That is for 2 horses.

I used to live in King County Washington. Farm plans through the conservation district were free, and they cost shared 50%. They had a manure spreader that could be borrowed. With the pandemic and inflation, people are struggling financially. People aren't going to be able to afford what you are asking them to do.

So I think this will just create more problems than it helps.

Long term planning would be better. Help conservation districts have cost share funding. Get locations to take waste, help livestock owners financially to comply, and they will do it willingly. Animal waste is a difficult problem for everyone.

Sent from my iPhone

Former Linda Daniela

From: Linda Daniels

Sent: 4/28/2022 11:24:56 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Please postpone

External Email

Please hold off till June on this issue, there are unresolved issues. Sincerely, Linda Daniels

Sent from Yahoo Mail for iPad

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Foverview.mail.yahoo.com%2F%3l

From: Evelyn Prill Sent: 5/5/2022 12:00:41 PM To: DOH WSBOH Cc:
Subject: Public Comment - Immunization Criteria for Child Care & School Entry
External Email
To Washington State Board of Health,
My understanding is that you will be discussing Immunization Criteria for Child Care & School Entry at your next meeting on Wed, January 12th.
I would like to express my DISAPPROVAL of mandating Covid shots for childcare & school entry. Please remember that children are at extremely low risk for Covid and that the vaccines are still only for emergency use authorization. These injections should absolutely not be a requirement for our children for childcare or school entry.
I do hope that you as the Washington State Board of Health do the right thing in your decision making in regards to this issue.
Thank you,
Evelyn Prill
Sent from Mail https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%forWindows

From: Glasoe, Stuart D (SBOH) Sent: 4/29/2022 11:41:31 AM

To: DOH WSBOH

Cc:

Subject: FW: Board Decision on Covid-19 vaccines

Stuart Glasoe

SBOH Health Policy Advisor

360-236-4111

From: Janet Young <antiejan@gmail.com> Sent: Friday, April 29, 2022 11:36 AM

To: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>

Subject: Board Decision on Covid-19 vaccines

External Email

After listening to all of the Board and TAG meetings, I am pleased with the thorough consideration of the need or not to vaccinate children in our state for Covid-19. I appreciate all of the time each member had to spend in their decision making.

I am very appreciative of the Board's decision not to recommend mandatory Covid-19 vaccination for Washington's school children. This is a very serious subject that parents need to ponder and make a decision for their own children. We do not know the long-term effects of this vaccine in children.

Sincerely,

Janet M. Young

Maple Valley, WA

April 29, 2022

From: Rochellie Hadley

Sent: 4/21/2022 11:48:22 AM

To: DOH WSBOH

Cc:

Subject: Thank you

External Email

Good morning,

I just wanted to take a few moments to tell you thank you, from the bottom of my heart, for voting in favor of the TAG recommendation to not add the Covid inoculation to the list of required immunizations for children to attend school. I understand that it was not an easy decision but I know in my soul that you are going to thank God for this decision in the future. You truly made the right choice.

Sincerely,

Rochelle, mother of 4 young children

Sent from my iPhone

From: sue coffman

Sent: 6/2/2022 7:18:06 AM

To: DOH WSBOH

Cc:

Subject: BOH meeting June 8

External Email

To the Board:

I just want to let you know that The People are still watching. It is important that all people continue to have their personal, constitutional, and medical rights upheld in our state, not to mention our country! The blind belief that the only way out of any health care issue is through an injection is just scientifically incorrect. Healthy living, proper eating, and appropriate medical treatment that includes all known protocols are the tools required for people to maintain good health and a vital immune system.

I would also like to express support for your meeting agenda item #13, to amend WAC 246-105-070, Duties of Health Care Providers or Organizations. This well-written petition calls for recipients (or parents) of EUA shots to have fully informed consent prior to any injection.

Look into the actual science that is being shunned and canceled in our society today by the overreaching of our medical establishments as well as our own government. Shame on us.

In truth,

Sue Coffman 714-337-4331 ICWA Team Leader Legislative District #24 https://informedchoicewa.org/

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Finformedchoicewa.org%2F&data="https%3A%2Finformedchoicewa.org%2F&data="https%3A%2Finformedchoicewa.org%2F&data="https%3A%2Finformedchoicewa.org%2F&data="https%3A%2Finformedchoicewa.org%2F&data="https%3A%2Finform

Forms Heathan Farms

From: Heather Feroy

Sent: 6/1/2022 9:38:29 PM

To: DOH WSBOH

Cc:

Subject: Vaccine requirement for children

External Email

To whom it may concern,

I understand that the topic of discussion regarding Covid vaccine requirements for children to attend public school will be in the near future, I would like to express my concerns.

I have two children, 7 and 9. Both whom are very healthy. My husband and I became ill with "Covid" twice since April 2020. During those times, our children were exposed and needed to be quarantined. Neither of them became symptomatic, too. They were exposed at school to children who also tested positive and still no symptoms. The children in their classes who tested positive didn't even have symptoms either. But because of "close contact," they were required to quarantine AGAIN!

Because both of my children were exposed with zero repercussions, they do not need the "vaccine!" They have NATURAL immunity because of their exposure. From everything I have read, if a child/adult are exposed, receiving the vaccine is more harmful to their bodies.

Like thousands of other families, I refuse to vaccinate my child against something that did not affect them whatsoever. My children don't receive the flu shot either.

Making a child receive a vaccine to attend school is completely unconstitutional, it's coercion, and it's wrong.

This "vaccine" was rushed during the creation. It's not a vaccine due to the mRNA. This is an EXPERIMENTAL DRUG! There is NO long term data tied to this vaccine to prove its effectiveness. Majority of the individuals who received the vaccines developed heart problems, difficulty breathing, seizures and death!!!!

I support agenda item #13, the citizen petition for rule-making . This well-written petition calls for medical workers who administer EUA shots (such as all the Covid shots), and shots that lack completed Phase III clinical trials (all the Covid shots), to give potential recipients (or parent) specific information prior to vaccination so that fully informed consent (or refusal) can happen.

Thank you for taking time out of your day to read my email,

Heather Feroy

Sent from my iPhone

From: Traci Stewart

Sent: 4/28/2022 6:24:26 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Keeping of Animals Proposed Rule

External Email

State Board of Health

I am hereby requesting you to remove the draft proposal from June's hearing agenda and suggesting you allow a work group/task force of stakeholders to convene and sort out the concerns before returning it to the agenda.

My concerns include: mixing livestock oversight with non-livestock; unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officer), and many more.

Traci Stewart PO Box 572 Deer Park, WA 99006

From: DOH Information Sent: 4/22/2022 8:54:58 AM To: DOH WSBOH
Cc: Subject: FW: Question/Comment from the public
attachments\D4CFA8C3EE2A4B09_image001.png
Good morning,
Below is feedback on the covid vaccine decision for school children.
Thank you,
Customer Service Specialist
Center for Public Affairs
Washington State Department of Health
DOH.Information@DOH.WA.GOV < mailto:DOH.Information@DOH.WA.GOV >
1-800-525-0127 www.doh.wa.gov https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.doh.wa.gov%2F&data=05%7">https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc0
https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.doh.wa.gov%2FNewsroom%
From: DOH Feedback <doh.information@doh.wa.gov> Sent: Thursday, April 21, 2022 9:57 PM To: DOH Information <doh.information@doh.wa.gov> Subject: Question/Comment from the public</doh.information@doh.wa.gov></doh.information@doh.wa.gov>
The following survey response is submitted:
1.
Please select one:

Please enter your comments or questions in the space provided below:

To the Washington State Board of Health. Thank you for your hard work over the last two years, and for your latest decision to not add the COVID19 shot to the list of requirements for children to attend public school. You have made the right choice. It seems a few fragments our democratic system may yet be working. One of your members mentioned the loss of public trust as being one of her primary concerns in this process. I heartily agree. As a citizen of Washington State, I have lost all trust in my public officials. This loss of trust began with the Governor seizing power through an emergency declaration and then forcing illogical and arbitrary mandates on me. More than two years have passed and Governor Inslee refuses to give up these powers. His latest reasoning in a long list of everchanging excuses, the need to keep Federal dollars flowing into our state, does nothing to rebuild the public trust. I also lost trust with my state representatives who have looked the other way this entire time, aiding and abetting our tyrannical governor. The loss of trust continued with the Superintendent of Public Instruction, who clearly stated he was pro-covid shot, while threatening any disloyalty to his covid orders with defunding of non-compliant school districts. When asked, State Superintendent Chris Reykdal stated the COVID shot requirement would be made on a statewide basis, undermining the authority of school boards, and therefore eliminating both school administrations and most importantly concerned parents, from the decisionmaking process. Finally, public trust was lost by you, the State Board of Health specifically, through continuing to promote only the vaccines for treatment despite the VAERS data showing ten's of thousands of deaths, and well over a million injuries to Americans from the COVID19 injections. Will the SBOH ever examine whether the vaccines you would be forcing on our children, formulated for the original strain of COVID19 way back in March of 2021, even be effective against the current mutations? (We can see they aren't. Why can't you see that?). Will the board ever discuss the data that clearly shows that children have a much higher likelihood of injury from the vaccine than from the disease? Please look over the latest study from Children's Hospital in Seattle published March 25th, 2022 in the Journal of Pediatrics. Has the board reviewed the benefits of natural immunity, or other options including the clear success of the Dr. Peter McCullough protocals advocating early treatment with safe, inexpensive, and readily available antiviral medications? If you were to ask me, I would tell you the restoration of public trust will begin when you give up the mantra of, "These vaccines are safe and effective", and start having a transparent and truthful conversation with the people, not the politicians, of this state. The thousands of comments from thousands of well-informed parents should be evidence that you are not in possession of all the information. I understand the extreme pressures you are under to support the official government narrative. Yet someday, in the not-too-distant future, we will look back and see this pandemic vaccination program for what many of us believe it to be, a crime

against humanity. In the end, I would want to be remembered for supporting the
freedom of choice for the individual citizens of this state, and not in support of a
governor who puts billions from the Federal Government before the rights of his
constituents. Respectfully, Brett M. Nunn

3.

If you are sending feedback on one of our Web pages, please paste the URL here: (no answer)

4.

Would you like a response?

Tell us how to get in touch with you.

Name:
Brett Nunn
Email:
brettnunn@hotmail.com <mailto:brettnunn@hotmail.com>
Telephone:
(no answer)

5.

To receive a confirmation of your submission, please enter your email address again in the space provided below.

brettnunn@hotmail.com <mailto:brettnunn@hotmail.com>

From: WCA Executive Vice-President

Sent: 4/29/2022 3:02:06 PM

To: DOH WSBOH Proposed Animal Waste Rule

Subject: WCA Comments on WSBOH Proposed Rule on Keeping of Animals

attachments\08916D6A7D6B48A5_WCA Comments SBOH Animal Waste 042922.docx.pdf

External Email

On behalf of the Washington Cattlemen's Association, thank you for the opportunity for WCA President, Jeff Keane to provide comment on the SBOH proposed rule on Keeping of Animals.

P.O. Box 96 ◆ Ellensburg, WA 98926 ◆ 509-925-9871 ◆ Fax 509-925-3004 WACATTLE@KVALLEY.COM ◆ WWW.WASHINGTONCATTLEMEN.ORG

To: Washington State Board of Health

Date: April 29th, 2022

Re: Keeping of Animals – WAC 246-203-130

Dear Members, Washington State Board of Health:

I was just briefed by our lobbyist that represents the Washington Cattlemen's Association in Olympia about the meeting he attended with legislators and your Chair and staff regarding **WAC 246-203-130 Keeping of Animals.**

While we acknowledge the Board's efforts to address grazing, we stand by our original assertion that this is unnecessary rulemaking on an already heavily regulated industry. In addition, we would point out the following:

Outreach on the Small Business Economic Impact Statement appears to be woefully inadequate – I cannot name one rancher that was reached out to on this issue, and I don't believe receiving 41 responses out of 1000 contacts really meets the straight-face test as far as stakeholder input.

Likely violates the state's Right to Farm law -

Unfortunately, in today's world, farmers and ranchers are often under attack from some in the environmental community, who don't seem to fully understand production agriculture. This has led to much consternation when urban-minded citizens move from city to country and don't find it to meet their idyllic vision. Fortunately, farmers and ranchers are protected by the state's 'Right to Farm" law. However, we fear this new proposal may be used as another tool to attempt to drag ranchers into court.

While we acknowledge the attempt to address grazing, there needs to be stakeholder input to clarify terms-

The current proposal references "free-range grazing", which is a term unfamiliar to us. We use the term "open-range grazing". In addition, an earlier version included pasture grazing and yet was removed from the current proposal. While open-range grazing would describe grazing where fences are built to keep livestock out, we would consider pasture grazing to describe fences being built to keep livestock in. This needs further discussion with stakeholders.

The WCA requests that the Board delay action on this proposed rule and create a workgroup with key stakeholders –

Rural citizens deserve a voice on the Board that can speak to agriculture and rural issues. We don't believe that currently exists. To balance that, we would request that a stakeholder workgroup that can

speak to the proposed rule with expertise in agriculture issues, be included as members of the workgroup.

Sincerely,

Jeff Keane

Jeff Keane, President Washington Cattlemen's Association ____

From: Susan Turner

Sent: 4/27/2022 11:40:08 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: More time needed

External Email

Please postpone the draft proposal from June's hearing and allow a work group/task force of stakeholders to convene and sort out the concerns.

Susan Turner

https://drive.google.com/uc?id=10_-
UVJH0W9V_A6pSq64y4xzzQr_QlJzl&export=download>

From: Becky Conway

Sent: 4/19/2022 7:12:22 AM

To: DOH WSBOH, DOH Secretary's Office

Cc:

Subject: Thank You for Listening to the Citizens of WA State

External Email

Dear BOH Members: Thank you for listening to the concerns of us as citizens of Washington State and for voting to adopt the TAG's recommendation to not add the COVID-19 vaccine to Washington's list of required immunizations for child care and school entry at your April 13 virtual public meeting. We are confident that the emerging scientific data will continue to affirm your decision. Thank you for your thoughtful consideration in your role to protect the health of the children in our State. respectfully,

Sent from my iPhone

From: Diana Putney

Sent: 4/28/2022 2:02:13 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Keeping of Animals on a rural farm

External Email

To Whom it may Concern

I am a member of the Island County Back Country Horsemen and own and live on a farm in a rural area, we have 4 horses and no other livestock. The horses each have their own stall and paddock and we have a pasture for turnout during the day. We clean all the horse manure in the paddocks, stalls and pasture every day and it is dumped into our two compost bins. The bins have cement floors and cement blocks for the sides. The compost is hauled out by a friend who has a front loader and a dump truck and uses the compost for his gardens. We do not spread any of the manure on the pasture. Our horses are fed quality Timothy hay and alfalfa pellets have water tanks that are kept clean. There are not any streams or lakes in the area where we live.

Sincerely

Diana Putney Edgewood Farm, Langley, WA

From: Alan Hansen

Sent: 5/8/2022 12:24:43 PM

To: DOH WSBOH

Cc:

Subject: Commit to no COVID vaccine mandates on children

External Email

Dear Washington State Board of Health,

I urge you to accept the TAGs recommendation and choose to NOT mandate covid vaccines on our children. Our state government should NOT be mandating Covid vaccines on our children. They are at extremely low risk for Covid and these medical decisions should be left in the hands of parents and their family doctors.

Sincerely,

The Citizens of Washington State

From: John Pavlick

Sent: 6/1/2022 11:45:13 AM

To: DOH WSBOH

Cc:

Subject: Covid shots for school aged children

External Email

To the members of the Washington State Board of Health,

Due to the current "leadership" (or rather lack thereof), in this state and country, I have lost all faith and trust in almost all of its agencies.

The Board of Health with its cookie cutter management approach to the covid issue is key amongst these.

I greatly recommend that the Board focus on trying to rebuild this trust with the public instead on forcing more draconian policies down our throats.

I applaud your decision to not mandate covid vaccinations for children. That was a small step in the right direction.

Keep the public informed and listen to our concerns. The Board ultimately relies on us, the taxpayers and parents. Do not abandon or ignore our concerns.

Politics and personal bias need to remain put of public health decisions.

I absolutely despise threats and there should be no place for them in the public discourse. I recall a board member scolding parents after the last zoom session, saying much the same thing. However, what do you think was going to happen? The BoH and the "leaders" of this once great state are threatening our children! The elimination of attitudes such as his and some modicum of self awareness on his part is in order. There is a massive amount of information coming out now in regards to the efficacy of the covid vaccines. They are not "safe and effective" like the mantra every Board member must utter. Do some more research and use common sense. "Following the science" is the 2022 version of "I was just doing what I was told". We all know how that worked out.

We are sick and tired of self-righteous busybodies telling us what is best for us and our own good.

Stay away from our kids. Keep us informed. Listen to us. Don't threaten us or our children. Do research. Use common sense.

Sincerely,

John Pavlick

Concerned Parent and frustrated taxpayer

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From: Trudy Jerdal

Sent: 4/19/2022 6:27:16 PM

To: DOH WSBOH

Cc:

Subject: Thank you for listening

External Email

I am so grateful that you listen to the parents, grandparents and concerned community regarding the mandatory vaccination for Covid. We have all had grave concerns and I am gratified to know that there is a body I've leaders who is willing to trust and listen to the hearts of the people who are responsible for these children. God bless you!

Trudy Jerdal mother/grandmother of 11

From: Rosemary Corn

Sent: 4/26/2022 3:03:04 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Manure handling proposal

External Email

Please postpone June meeting until we attain more information. Thank you Rosemary Corn of rattlesnake ridge riders backcountry horse man group .

- A D III I

From: A.D. Henkens

Sent: 6/1/2022 1:05:22 PM

To: DOH WSBOH

Cc:

Subject: Do not add covid shots for school requirements!

External Email

I am 100% against covid shot requirements for students to attend school. This should be a choice for families!

Does it work or not? Those taking the shot should have this choice for themselves, period. This shot does not make the different versions of covid more or less contagious to other people, period.

There is also unintended consequences of requiring booster after booster, and what happens is vaccine exhaustion and the body is weakened by these shots.

Healthy children are not at risk by getting covid. Covid shot is not a shield from getting covid, not from spreading it.

If someone has symptoms, they need to stay home and take care of themselves.

Do not require this covid shot to anyone! It needs to be choice!

From: Mark - Alan: Tisland @ CLG / NATF

Sent: 4/28/2022 6:02:06 PM

To: Cc:

Subject: Herbalist's Charter of Henry the VIII, 1543 A.D.

External Email

According to Ralph Fucetola, JD, "When the American Colonies declared their independence as Sovereign States, in July, 1776, they each adopted the Laws of England as the Common Law of the State. Among the Laws of England so adopted is the Herbalist's Charter, an Act of Henry the Eighth (in the Eighth Year of his reign). It is astonishing to note that many of the issues confronting alternative practitioners today are the same issues which the Act of Parliament addressed. In the Sixteenth Century, as in the Twentieth Century, licensed physicians and surgeons were going to Court to ban the activities of the alternative practitioners of their day, the herbalists. Parliament ordered an end to this misuse of the Courts to enforce licensure, protecting the nutritionists from "suit, vexation, trouble, penalty, or loss of their goods..." This ancient Act of Parliament applied to England and the King's "other dominions" including, of course, the American Colonies, and later, States. This Act has never been repealed, and thus remains part of our Common Law to this day, offering protection to alternative practitioners, "at all Time from henceforth..." as a perpetual Charter of Rights." This Charter is referenced on PubMedCentral at:

PubMed NIH 1543 Charter

https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.pubmedcentral.nih.gov%2Fairlearn

The text of the Charter reads:

Herbalist's Charter of Henry the VIII, 1543 A.D.

"An Act that Persons, Being No Common Surgeons, May Administer Outward Medicines" "Where in the Parliament holden at Westminster in the third Year of the King's most gracious Reign, amongst other Things, for the avoiding of Sorceries, Witchcrafts and other Inconveniences, it was enacted, that no Person within the City of London, nor within Seven Miles of the same, should take upon him to exercise and occupy as Physician or Surgeon, except he be first examined, approved, and admitted by the Bishop of London and other, under and upon certain Pains and Penalties in the same Act mentioned;

"Sithence the making of which said Act, the Company and Fellowship of Surgeons of London, minding only their own Lucres and nothing the Profit or ease of the Diseased or Patient, have sued, troubled and vexed divers honest Persons, as well as Men and Women, whom God hath endued with the Knowledge of the Nature, Kind and Operation of certain Herbs, Roots and Waters, and the using and ministering of them to such as been pained with customable Diseases, as Women's Breasts beings sore, a Pin and the Web in the Eye, Uncomis of Hands, Burnings, Scaldings, Sore Mouths, the Stone, Strangury, Saucelim and Morphew, and such other like Diseases; and yet the said Persons have not taken anything for their Pains or Cunning, but have ministered the same to poor People only for Neighborhood and God's sake, and of Pity and Charity: "And it is now well known that the Surgeons admitted will do no Cure to any Person but where they shall be rewarded with a greater Sum or Reward that the Cure extendeth unto; for in the case they would minister the Cunning unto sore People unrewarded, there should not so many rot and perish to death for Lack or Help of Surgery as daily do; but the greatest part of Surgeons admitted been much more to be blamed than those

Persons that they troubled, for although the most Part of the Persons of the said Craft of Surgeons have small Cunning yet they will take great sums of Money, and do little therefore, and by Reason thereof they do oftentimes impair and hurt their Patients, rather than do them good.

"In consideration whereof, and for the Ease, Comfort, Succour, Help, Relief and Health of the King's poor Subjects, Inhabitants of this Realm, now pained or diseased: "Be it ordained, established and enacted, by Authority of this present Parliament, That at all Time from henceforth it shall be lawful to every Person being the King's subject, having Knowledge and Experience of the Nature of Herbs, Roots and Waters, or of the Operation of the same, by Speculation or Practice, within any part of the Realm of England, or within any other the King's Dominions, to practice, use and minister in and to any outward Sore, Uncome Wound, Aposelmations, outward Swelling or Disease, any Herb or Herbs, Ointments, Baths, Pultess, and Emplaisters, according to their Cunning, Experience and Knowledge in any of the Diseases, Sorea and Maladies beforesaid, and all other like to the same, or Drinks for the Stone, Strangury or Agues, without suit, vexation, trouble, penalty or loss of their goods;

"The foresaid Statute in the foresaid Third Year of the King's most gracious Reign, or any other Act, Ordinance or Statues the contrary heretofore made in anywise, not withstanding."

Know your Rights or you will not know what is being pillaged from you by others and your own "government".

Interesting side note to any not aware: The Greek word: "pharmakia" is where we derive our modern term: "pharmacy" and "pharmaceutical". The transliteration of Greek to English is: 1) Sorcery; 2) Poison

Tiz @ CLG / NATF

I am

Sovereign by nature of existence; not of license nor statute, and it does not take leave based on administrations, nor does it suffer deprivation due to jurisdiction. Sovereignty remains while policies change.

"They" say that Life is what you make it.

What are we to do, upon confirmation that "they" are Liars?!

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Sent with ProtonMail

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fprotonmail.com%2F&data=05%76 secure email.

From: Janice W

Sent: 4/26/2022 3:12:48 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Delay needed

External Email

The draft proposal on the keeping of animals and their waste products needs to be postponed. Having this on the June's hearing is rushing things to much as there are many unanswered questions. I believe that a work group needs to be formed that can address the many issues involved. Mixing livestock oversight with pets will not work. There needs to be uniformity of enforcement across the board, not leaving the decisions up to each individual health officer. These are just some of the many issues with this proposal.

Sincerely, Janice Williamson

Owner of a dog, a cat, and a horse.

From: Dan DeGroot

Sent: 5/26/2022 12:26:32 PM

To: DOH WSBOH

Cc:

Subject: My Public Comments

External Email

This 'rule' was originally designed for "Keeping of Animals" in an urban setting. Facilities located in an agricultural zoned area should be exempt if there is a regular inspection of the facilities by one or more state or Federal agencies.

I have a dairy facility that is inspected by the Grade A Milk Inspector several times annually and includes inspection of manure and animal housing areas to ensure there is not excessive stockpiling of animal nutrients. I am inspected regularly by the Nutrient Management Inspector from the Washington State Dept of Agriculture. I maintain a Federal Confined Animal Feeding Operation (CAFO) Permit that is regulated by the EPA, the Washington Department of Ecology and the Washington Department of Agriculture. I had been involved with air quality plans and inspected by the Yakima Regional Clean Air Authority. I believe that I am well inspected and watched closely by both the State, Federal and Local governments.

Not providing exemption to those with regulated facilities in ag zoned areas will only cause confusion, to all those inspecting and being inspected, by adding another set of rules. This type of rule is being promoted by those who have a bias against dairies and animal agriculture. This is a broader topic that should not reside with the Local Health District.

Dan DeGroot Skyridge Farms

From: Ken Harp Sent: 5/16/2022 11:04:57 AM To: DOH WSBOH
Cc: Subject: Petition to Amend WAC 246-105-070
attachments\398C31E2108E4338_WAC 246-105-070 Amend Petition_KH_20220516a.pdf
External Email
Greetings Washington State Board of Health,
A Petition to Amend WAC 246-105-070 is attached and provided in accordance with RCW 34.05.330
< https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fapps.leg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Frcw%2Fdefalleg.wa.gov%2Fde
If you have any questions and/or comments regarding this Petition please feel free to reach out.
Respectfully,
Ken Harp
13920 93rd Avenue NE
Kirkland, WA 98034
206.218.7639

From: Yael Kantor

Sent: 6/1/2022 11:46:27 AM

To: DOH WSBOH

Cc:

Subject: Covid shots

External Email

Dear members of the BOH

Please show us the science supporting injecting children who have zero risk of dying from covid with a vaccine that has no long term safety data and has many severe side effects such as myocarditis.

There is zero benefit of this vaccine in anyone under the age of 65. It does not prevent transmission or infection. Breakthrough cases are prevalent in the fully vaccinated and boosted.

Please read through the Pfizer documents. 1200 people died in the testing. There is far too much unknown to risk our children's lives with this product. Again for what? Recommending this shot to any age group is ridiculous. Mandating it would be criminal.

I support agenda item #13, the citizen petition for rulemaking . This petition calls for medical workers who administer EUA shots (such as all the Covid shots), and shots that lack completed Phase III clinical trials (all the Covid shots), to give potential recipients (or parent) specific information prior to vaccination so that fully informed consent (or refusal) can happen. We are now seeing the devastating effects these vaccines have had on the lives of some people - informed consent is an absolute must.

It's time to stop catering to big pharma. These children's lives and future are in your hands. Make the right decision.

Thank you Your constituent France Classes Charact D (CDOII)

From: Glasoe, Stuart D (SBOH) Sent: 5/4/2022 9:57:40 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: FW: CR 102 Domestic Animal Waste

Stuart Glasoe

SBOH Health Policy Advisor

360-236-4111

From: DOH WSBOH < WSBOH@SBOH.WA.GOV >

Sent: Wednesday, May 4, 2022 9:21 AM

To: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>

Subject: FW: CR 102 Domestic Animal Waste

Hey Stuart,

Forwarding a comment pertaining to KoA that Kaitlyn received on Sunday (see attached).

There were 2 other emails about KoA sent last week from people. I saw that they emailed the WSBOHProposedAnimalWasteRule@sboh.wa.gov <mailto:WSBOHProposedAnimalWasteRule@sboh.wa.gov> those times so I didn't forward to you directly – did you see those? Those two were sent from Saundra Richartz and Ron/Barbara Downing (PCCHCH Memberships).

Nathan Thai

Communications Consultant

Washington State Board of Health

Nathaniel.Thai@sboh.wa.gov < mailto:Nathaniel.Thai@sboh.wa.gov >

360-463-8928

Website

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Message was attached to: FW: CR 102 Domestic Animal Waste

From: Donahoe, Kaitlyn N (SBOH)

Sent: 5/1/2022 6:04:37 PM

Cc:

Subject: Fwd: CR 102 Domestic Animal Waste

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To: DOH WSBOH

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From: Jon Borcherding <jonreadsitall@protonmail.com>

Sent: Sunday, May 1, 2022 3:32:34 PM

To: Donahoe, Kaitlyn N (SBOH) <kaitlyn.donahoe@sboh.wa.gov>

Subject: CR 102 Domestic Animal Waste

External Email

The Washington State Board of Health has chosen a remarkably inopportune moment to address what is described as a long-standing issue.

With supply-chain problems and fertilizer shortages affecting the global food supply, many experts including the Biden Administration are predicting food shortages. The recent destruction of at least 12 major food production plants will likely also contribute to food shortages. The nation's railways are refusing shipment of nitrogen fertilizers during the current planting season. The FBI has just released a bulletin outlining the threat of cyber attacks against agricultural facilities. There is NO shortage of threats to America's food supply.

In addition to the looming specter of food scarcity is the alarming rate of inflation which disproportionately impacts the poor by making food more and more unaffordable.

In an effort to stave off shortages and hunger, many homeowners are engaging in small scale food production i.e., vegetable gardens, raising chickens, rabbits, pigs, goats, sheep, etc. Any new regulation that impedes the homestead production of vital food resources is bound to be met with fierce resistance.

In an era when we are experiencing global shortages of nitrogen fertilizers due to foreign conflict, it seems like a good time to review our attitudes about animal waste products and learn to treat them like the resource they are.

There are already laws on the books regarding proper animal husbandry and the Board would be well advised to address current problems within the existing framework. New rulemaking at this time is also bound to lead to increased cost to the taxpayer at a time when we are seeing record inflation.

Has the Board estimated the cost of enforcement of new proposals? Surely there is an awareness that commissioned law officers and search warrants will be necessary to

investigate the disposition of animal waste on private property?

Also at issue is the credibility of the Health Department. It is not reasonable to expect homeowners to accept heavy handed regulation of traditional food production activities on their private property, particularly at a time when homestead food production may be key to survival. One can easily imagine the erosion of respect resulting from any attempt to use government force to hinder necessary farming activity.

I strongly urge the Washington State Board of Health to delay the Draft Policy proposal scheduled for June 2022. I believe it is in the best interests of all citizens that a work group or task force is formed to study the concerns of all stakeholders and advise the Board prior to the drafting or adoption of any new rules regarding the keeping of animals.

Sincerely,

Jon M. Borcherding

Roy WA

From: Sherryl van den Heuvel

Sent: 6/1/2022 12:41:26 PM

To: DOH WSBOH

Cc:

Subject: COVID Elementary & Secondary Children

External Email

I am a Washington resident and citizen of the United States of America. You are one of the state government leaders I voted for, or who is appointed by someone I voted for. So, you represent me. You were elected to serve and protect the interests and civil liberties of Washington residents. I am sending you this letter for a single reason: I demand that you use the power and influence of your elected office and stewardship to immediately appoint a special prosecutor to investigate crimes committed upon me and my family and the residents of Washington and our country. The crime: The development, marketing, sale, and use of bioweapons administered to unsuspecting people, like me, by the pharmaceutical industry, academic institutions, legacy media, and healthcare machine respectively. The crimes also include the federal government and state government mandates and enforced reception of the bioweapons. The federal and state governments have pursued these actions through their numerous administrative agencies, and other collaborators (the "Participants"). I was told by all of these Participants that these bioweapons (the mandated injections made by multiple manufacturers) were a "safe and effective vaccine" to immunize me and my family against the "novel disease," COVID-19, caused by the "novel virus," SARS-CoV-2. The injections/bioweapons are not and never were vaccines. No, they were designed and patented as bioweapon knowingly imposed upon me and my family, our neighbors, and the citizens of our state, our country, and the world. The inconvenient evidence, compiled by the Participants themselves throughout the public record of the US Patent and Trademark Office, reveals this calculated criminal activity was an intended deception created and pursued by the Participants in violation of US Code 18 USC § 175. This statute prohibits the development, production, stockpiling, transfers, acquisitions, retention and possession of any biological agent, toxin, or delivery system for use as a weapon ... or to knowingly assist a foreign state or any organization to do so, or to attempt, threaten, or conspire to do so. These crimes perpetrated by the Participants have directly injured me and my family personally as well as our property. The consequences of their crimes have trampled my constitutionally guaranteed civil liberties. These crimes have been perpetrated by elected and appointed government officials and their allies. It is time that the light that only a special prosecutor can bring to these dark facts be shown on these nefarious activities. Again, I demand you take immediate action to appoint a special prosecutor to investigate and prosecute this criminal activity. May freedom ring,

Sent from my iPad

From: Cindy Reece

Sent: 4/27/2022 11:52:55 AM
To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: CR-102



attachments\42ECD7F90A5541EC_WSBOH .pdf

External Email

Please see attached letter Thank you Jim and Cindy Reece

April 27, 2022

Washington State Board of Health

Re: CR-102, Proposed Rule, for WAC 246-203-130, Keeping of Animals.

Good Day

Upon review of the proposal rule, its claim that it "applies to everyone" is misleading. Areas that are incorporated and on municipal water systems already have regulations regarding livestock (i.e. quantity limits, type of livestock such as chickens, no roosters) and domestic pets (i.e. leash laws, waste disposal and quantity).

As such, it appears the target for this proposed rule would be imposed on unincorporated commercial and private acreage with livestock.

As such, we are of the opinion that this proposal should fall under the scope of authority of the Washington State Department of Agriculture (WSDOA). The Department of Agriculture's charter provides the agriculture community ensuring agricultural regulations are observed. They work extensively with commercial operations, but their responsibilities range from ensuring food safety to environmental protections for water quality.

They also have the ability to work with landowners who have self-imposed farm plans that regulate animal waste. These plans need to be grandfathered in.

If the regulations under the WSDOA for waste management are insufficient, those should be updated. They have the authority and infrastructure to mandate and enforce the waste management regulations.

The Conservation Districts who submitted this rulemaking petition, have a charter to engage people with voluntary actions that keep our air, water, soil, habitats, and **farmland healthy** for all. They should be petitioning the Department of Agriculture for changes, and not the Board of Health.

Regarding the regulations proposed these need to be more specific, if not they are subject to bias by those who implement and enforce.

For examples, Standards for non-livestock:

For landowners with acreage, would land owners be required to pick their field to find their pet animal waste for temporary storage in a water tight container and disposal?

Would land owners be required to fence property to prevent their cats and dogs from migrating to adjacent neighbors? What regulations would be in place, or recourse would a landowner have, if their neighbors deliberately allow, or walk their dogs or cats to defecate on their neighbor's property to avoid collection/containment/disposal? Would land owners be required to sign their property "No Trespassing" to prevent this?

Will domestic pets be restricted from retention ponds, creeks, and rivers on one's property?

Standards for stockpiled waste from livestock:

What is considered stockpiled? Collected for composting? piled up like an equine stud pile? concentrated defecation in a confinement area?

Is all livestock waste to be removed, including poultry, goats, sheep, ducks, if found within the 100 ft setback?

Will livestock waste need to be separated by omnivore (i.e pigs, ducks, chickens) or herbivore, to allow it to be composted? And if so, how is the omnivore waste to be disposed of?

Is composted livestock waste allowed to be spread on lands within the 100 ft setbacks?

What criteria will be set to determine if composted waste is acceptable to be spread? And who will make that determination?

What odors need to be controlled? Waste odors, composting odors, animal odors?

What constitutes odor control and at what distance and duration does a landowner have responsibility to control the odor? What device will be used to detect odors?

Will chicken compost be prohibited from being utilized?

Can you specify what pests are to be controlled?

These are just some of the clarifications needed before moving forward with regulation with the Department of Agriculture.

Thank you for your time,

Regards,

Jim and Cindy Reece

Small acreage land owner

From: Chris Leaverton

Sent: 4/28/2022 8:23:36 AM

To: DOH WSBOH Proposed Animal Waste Rule

Subject: CR-102 Keeping of Animals

External Email

I am asking that you delay the implementation of cr-102. Please allow a work/task group to convene with members who make up those who will be affected by this rule.

Farm composting of ruminant waste is vital to my small rural Prosser farm. The composting process is even part of the life cycle of the farm. Its starts with forage to manure to compost to vegetables.

Thank You,

Chris Leaverton

From: obard31@gmail.com Sent: 4/28/2022 5:07:41 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal waste rule making

External Email

To whom it may concern: I'd sure like see a work group or task force made up of stakeholders implemented in order to address concerns and ideas about animal waste in the State of Washington. It is very concerning that the State would allow counties to address this issue without a uniform manner or guidelines. Please delay the vote on this and implement a work group. I'd consider being on that workgroup if you were looking for help. Thanks for your time. -Andy Faubion

From: Hisaw, Melanie (SBOH)

Sent: 4/19/2022 9:27:17 AM

To: DOH WSBOH

Cc:

Subject: Public comment via mail



attachments\74036616226D49E6_20220418143947023.pdf

attachments\953066CE602F4926_20220418143959409.pdf

Hi Nathan,

Attached is mail that I scanned from Carla Messal from Cheney, WA. She sent in Public comment before, and these are some more notes. I realized part of the 2nd scan got cutoff in the scanning process, don't know why. But I think the message is clear enough, and she's sent many letters before. Please add it to the public comments.

Thanks!

Melanie Hisaw

Executive Assistant

Washington State Board of Health

melanie.hisaw@sboh.wa.gov <mailto:melanie.hisaw@sboh.wa.gov>

360-236-4104

360-688-3719 (cell)

Website

- < https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2F&data=05%7C012, Facebook
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Protect and keep our

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Shauna Muendel P.O Box 47990 Olympia Wa 98504-7990

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APR 10 2022 WA State Board of Health

Elisabeth, Please help support and protect or children. By not passing



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WA State Board of Health

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WA State Board of Health

Fran, et upu are able to help bupport, our children. you could be



Expressions-

From: Glasoe, Stuart D (SBOH) Sent: 4/25/2022 7:29:01 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: FW: Proposed Rule, for WAC 246-203-130,

Stuart Glasoe SBOH Health Policy Advisor 360-236-4111

-----Original Message-----

From: Donna Frankel <dfrankel2c714@gmail.com>

Sent: Saturday, April 23, 2022 7:44 PM

To: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>

Subject: Proposed Rule, for WAC 246-203-130,

External Email

Just want to let you know that I am in favor of this proposal. It is long overdue.

Donna Frankel, 1794 Happy Valley Road, Sequim, WA 98382

Fuerra Cinalatan Chinanastia

From: Singleton Chiropractic Sent: 6/1/2022 2:46:49 PM

To: DOH WSBOH

Cc:

Subject: covid vaccine in schools

External Email

Dear Sirs:

I have been opposed to covid vaccines in the schools from Day 1 and am writing to encourage you to keep it from becoming a requirement. The parents, guardian and PCP will be the ones to decide if a child needs to be addressed medically, especially with something which was released on the market in a very short period WITHOUT PROPER LONG-TERM TESTING on it. Remember, the majority that test covid-positive do not have symptoms or their symptoms are very mild. This is ADULTS and children will suffer symptoms to a MUCH LESSER DEGREE. Mandating an unproven and unneeded vaccine to be injected into our little kids is reckless, pointless and dangerous. I also wanted to impress upon you my support for Agenda item #13 on consumer rulemaking.

Ron Singleton Wenatchee

From: Phoebe Trocano

Sent: 4/26/2022 6:27:48 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal waste

External Email

Please postpone th June deadline, so that a task force can be formed to specifically identify, & form solutions for, Th concerns discussed.

Sincerely,
Rick & Phoebe Trocano
Members BCHW

F C C C L D (CDOLL)

From: Glasoe, Stuart D (SBOH) Sent: 3/30/2022 11:40:49 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: FW: CR-102 Proposed Rule Alert: Keeping of Animals (WAC 246-203-130)



attachments\313DEAB82F1E42ED_image003.png

Stuart Glasoe

SBOH Health Policy Advisor

360-236-4111

From: Marie Tabata-Callerame <aikotabcal@hotmail.com>

Sent: Monday, March 28, 2022 7:20 PM To: DOH WSBOH < WSBOH@SBOH.WA.GOV>

Cc: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>

Subject: Fw: CR-102 Proposed Rule Alert: Keeping of Animals (WAC 246-203-130)

External Email

Hello,

Since emails are not going through to the "WSBOHProposedAnimalWasteRule@sboh.wa.gov <mailto:WSBOHProposedAnimalWasteRule@sboh.wa.gov> " address, please direct this public comment email to the proper person. Thank you!

Marie Tabata

(360) 448-7925

(312) 933-2293 cell

From: Marie Tabata-Callerame <aikotabcal@hotmail.com

<mailto:aikotabcal@hotmail.com> > Sent: Monday, March 28, 2022 7:13 PM

To: WSBOHProposedAnimalWasteRule@sboh.wa.gov <mailto:WSBOHProposedAnimalWasteRule@sboh.wa.gov <WSBOHProposedAnimalWasteRule@sboh.wa.gov

<mailto:WSBOHProposedAnimalWasteRule@sboh.wa.gov> >

Subject: Re: CR-102 Proposed Rule Alert: Keeping of Animals (WAC 246-203-130)

My comment/suggestion is to add to the purpose the protection of stormwater quality. As temperatures rise, our rivers and lakes are having serious algae overgrowth issues. Thus, levels of feces that got into the water that were acceptable in a cooler temperature now create serious problems for aquatic environment. Thus, this issue is outside of just being a "health hazard" - it is an environmental protection issue.

Thanks for all the hard work you are doing!

Marie Tabata

Vancouver, WA

(360) 448-7925

(312) 933-2293 cell

From: DOH WSBOH <WSBOH@SBOH.WA.GOV <mailto:WSBOH@SBOH.WA.GOV> >

Sent: Monday, March 28, 2022 3:26 PM

Subject: CR-102 Proposed Rule Alert: Keeping of Animals (WAC 246-203-130)

The Washington State Board of Health (Board) has filed a CR-102, Proposed Rule, for WAC 246-203-130, Keeping of Animals. The proposed rule includes a title change to Domestic Animal Waste. The proposed rule includes standards for the handling and disposal of animal excreta, or animal waste, for the purpose of preventing and controlling nuisance and health hazards.

The CR-102, filed as WSR 22-08-003, announces to the public that a rule is being proposed and includes the proposed rule language. The CR-102 is attached and related material can be accessed at the Board's rulemaking page

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2Frulemaking%2Fcrules-and-activity%2Fkeeping-

animals&data=04%7C01%7CWSBOHProposedAnimalWasteRule%40sboh.wa.gov%7C5ccec5bfb9d844a5e1

You may submit your comments on the proposed rule the following ways:

1. Written comments are accepted through May 2, 2022, using the following options:

- Send to the Board's public comment email address for this proposed rule: WSBOHProposedAnimalWasteRule@sboh.wa.gov
 <mailto:WSBOHProposedAnimalWasteRule@sboh.wa.gov>
 - 2. Send via U.S. Mail to:
 - Washington State Board of Health PO Box 47990
 □OlympiaWA 98504-7990

Please Note: All written comments submitted to the Board will be considered part of the official rulemaking file, provided to Board members for their consideration, and will be posted publicly to the Board's website.

1. Verbal comments will be accepted on June 8, 2022, during the online rules hearing open to the public

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2Fmeetings%2

Access and register for the online rules hearing:
 https://us02web.zoom.us/webinar/register/WN_6vqdRyUmTamyb61z3wCSBA
 https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fus02web.zoom.us%2Fwebinar%2

Important Information for the Rules Hearing:

- * The online rules hearing will be held via the Zoom Webinar platform
- * In order to give verbal testimony during the rules hearing, you will need to access the meeting using your computer, laptop, or device. Your computer, laptop, or device must have speakers and a microphone.

For more information regarding this rule revision please:

- Visit the Board's Keeping of Animals rulemaking web page <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2Frulemaking%2Fcrules-and-activity%2Fkeeping-animals&data=04%7C01%7CWSBOHProposedAnimalWasteRule%40sboh.wa.gov%7C5ccec5bfb9d844a5e1cor
- 2. Email Board staff at stuart.glasoe@sboh.wa.gov <mailto:stuart.glasoe@sboh.wa.gov > .

Thank you,

(360) 236-4110

P.O. Box 47990, Olympia, WA 98504-7990

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- Subscribe
- <mailto:wsboh@sboh.wa.gov?subject=Please%20Add%20My%20Name%20to%20the%20WSBOH%20Em</pre>

This announcement is being sent to the Board's general distribution list and other distribution lists associated with this rulemaking. Please excuse any duplications.

From: Gen Mossman

Sent: 5/20/2022 5:26:05 PM

To: DOH WSBOH

Cc:

Subject: Re: see attachments re NTI bio

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External Email

I sent you a link earlier that can no longer be found on the Internet.

On Fri, May 20, 2022, 6:12 AM Gen Mossman <mossman.genevieve@gmail.com <mailto:mossman.genevieve@gmail.com > wrote:

I'm am writing due to my concern about the Monkeypox virus. I don't know the extent of the concern on this day, however, Title 42 is set to expire on May 23, 2020. With this virus, and the unknown of potential outbreak, is it safe to keep the border open without health and safety checks?

https://www.bbc.com/news/uk-england-london-61449214 <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.bbc.com%2Fnews%2Fuk-england-london-61449214&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C700333fdaf9d4b57010608da3ac072f3%7C11d

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decision%2F2973071%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C700333fdaf9d4b57010608da3a

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decision%2F2973071%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C700333fdaf9d4b57010608da3a

From: bassoonbarb@yahoo.com Sent: 4/28/2022 8:21:21 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal waste proposed ruling

External Email

To whom it may be appropriate:

I often walk my dogs on trails & in parks where the dog owners fail to pick up & remove their dogs messes. It is a horrible offensive smell to pass by and even worse step in the mess. There is signage for dog owners to pick up the waste however it is not being done and there is absolutely no one enforcing this rule.

For anyone to push livestock owners to remove their "herds" waste seems to be an absurd step in the wrong direction. When it is already difficult to find emloyees for any government office then who will manage the proposed law if it is acted upon? Where is the enforcement money coming from? Livestock waste does not have the offensive odor that small animal waste has.

I really advise officials to postpone this ruling and rethink consequences of the actions on ranchers and farmers. How many ranchers have left and more will leave ranching? Where will you obtain your next steak; rare and expensive?

Horse owners help pay government officials through the high taxes paid. What happens when that goes away?

This issue MUST be rethought!

Sincerely, Barbara Bennett-Penniston 98926

From: Lang, Caitlin M (SBOH) Sent: 4/29/2022 12:20:24 PM

To: DOH WSBOH

Cc:

Subject: FW: Board Decision on Covid-19 vaccines

From: Janet Young <antiejan@gmail.com> Sent: Friday, April 29, 2022 1:32 PM

To: Lang, Caitlin M (SBOH) <Caitlin.Lang@sboh.wa.gov>

Subject: Board Decision on Covid-19 vaccines

External Email

After listening to all of the Board and TAG meetings, I am pleased with the thorough consideration of the need or not to vaccinate children in our state for Covid-19. I appreciate all of the time each member had to spend in their decision making.

I am very appreciative of the Board's decision not to recommend mandatory Covid-19 vaccination for Washington's school children. This is a very serious subject that parents need to ponder and make a decision for their own children. We do not know the long-term effects of this vaccine in children.

Sincerely,

Janet M. Young

Maple Valley, WA

April 29, 2022

From: Gig Kerr

Sent: 4/26/2022 3:36:38 PM To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Proposed rule

External Email

hope you hold off on making rules till you're sure of the best solutions to the many issues.

From: Sheila Blakely

Sent: 4/27/2022 7:57:08 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: re: Animals waste Dept of Health

External Email

Dear Sir or Madam:

I would first like to ask that this proposal by the Dept. of Health on keeping animals, waste would be postponed until a work group to study this issue and concerns has been formed. Farmers, ranchers and others who keep animals are already usually very concerned with keeping their animals healthy and their properties environmentally friendly. Most of us use animal waste (horse, cattle, goat, sheep etc.) by composting it and incorporating it back into the soil.

Often people who make complaints about animal keeping have no idea what is involved. They often think country life looks fun, then move to a place where suddenly they are seeing flies and smelling animals. I don't think that it would be fair to suddenly tell the rancher to change his way when the city dwelling moves into the area.

I would like to see the work group have many members that are experienced animal keepers on it so that the issues that will be involved will be grounded in reality. Do you eat steak? Pork? If so, then we need to keep our producers from having to deal with over involvement from someone who doesn't understand the issues.

Thank you Sheila Blakely Backcountry Horsemen of Washington

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From: Melissa Moser

Sent: 4/23/2022 5:07:59 AM

To: DOH WSBOH

Cc:

Subject: Fwd: Covid vaccines

External Email

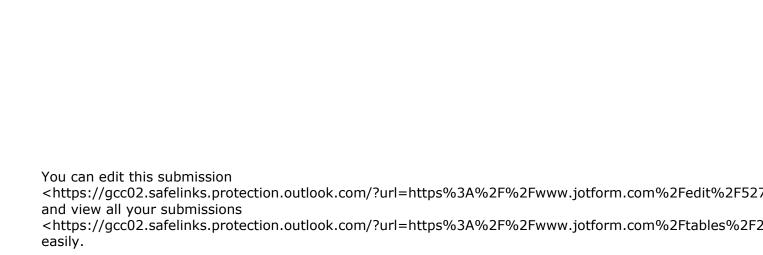
□Hello,

Thank you for all you do and your consideration with this information: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9012513/ https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ncbi.nlm.nih.gov%2Fpmc%2

Best regards, Melissa Moser

From: Jotform Sent: 5/4/2022 7:09:45 AM To: DOH WSBOH Cc:
Subject: Re: Stop The Child Vaccine Mandate Petition - Melanie Sawaya
External Email
https://cdn.jotfor.ms/assets/img/logo2021/jotform-logo.png
Stop The Child Vaccine Mandate Petition
Name
Melanie Sawaya
Email
msawaya18@gmail.com
Zip

, , , , 98466



Cell Phone Number

(253) 3802211

From: Imulmt@yahoo.com Sent: 4/27/2022 10:37:22 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal waste

External Email

I think that your policies are so unclear that any one that works for your department could abuse their authority when enforcing unclear laws. I request that you hold off June law making until more fair and scientific and cultural investigating is done. We don't need more confusion.

Thank you, Lori Uhler

Sent from my iPhone

From: susan_conard@comcast.net

Sent: 5/6/2022 3:43:23 PM

To: DOH WSBOH

Cc:

Subject: FW: Re: CR-102, Proposed Rule, for WAC 246-203-130, Keeping of Animals.

External Email

Good Day

Upon review of the proposal rule, its claim that it "applies to everyone" is misleading. Areas that are incorporated and on municipal water systems, already have regulations regarding livestock (i.e. quantity limits, type of livestock such as chickens, no roosters) and domestic pets (i.e. leash laws, waste disposal and quantity).

As such, it appears the target for this proposed rule would be imposed on unincorporated commercial and private acreage with livestock.

As such, we are of the opinion, that this proposal should fall under the scope of authority of the Washington State Department of Agriculture (WSDOA). The Department of Agriculture's charter provides the agriculture community ensuring agricultural regulations are observed. They work extensively with commercial operations, but their responsibilities range from ensuring food safety to environmental protections for water quality.

They also have the ability to work with land owners who have self-imposed farm plans that regulate animal waste. These plans need to be grandfathered in.

If the regulations under the WSDOA for waste management are insufficient, those should be updated. They have the authority and infrastructure to mandate and enforce the waste management regulations.

The Conservation Districts who submitted this rule making petition, have a charter to engage people with voluntary actions that keep our air, water, soil, habitats, and farmland healthy for all. They should be petitioning the Department of Agriculture for changes, and not the Board of Health.

Regarding the regulations proposed these need to be more specific, if not they are subject to bias by those who implement and enforce.

For examples, Standards for non-livestock:

For land owners with acreage, would land owners be required to pick their field to find their pet animal waste for temporary storage in a water tight container and disposal?

Would land owners be required to fence property to prevent their cats and dogs from migrating to adjacent neighbors? What regulations would be in place, or recourse would a landowner have, if their neighbors deliberately allow, or walk their dogs or cats to defecate on their neighbor's property to avoid collection/containment/disposal? Would land owners be required to sign their property "No Trespassing" to prevent this?

Will domestic pets be restricted from retention ponds, creeks, and rivers on one's property?

Standards for stockpiled waste from livestock:

What is consider stockpiled? Collected for composting? piled up like an equine stud pile? concentrated defecation in a confinement area?

Is all livestock waste to be removed, including poultry, goats, sheep, ducks, if found within the 100 ft setback?

Will livestock waste need to be separated by omnivore (i.e pigs, ducks, chickens) or herbivore, to allow to be composted? And if so, how is the omnivore waste to be disposed of?

Is composted livestock waste allowed to be spread on lands within the 100 ft setbacks?

What criteria will be set to determine if composted waste is acceptable to be spread? And who will make that determination?

What odors need to be controlled? Waste odors, composting odors, animal odors?

What constitutes odor control and at what distance and duration does a land owner have responsibility to control the odor? What device will be used to detect odors?

Will chicken compost be prohibited from being utilized?

Can you specify what pests are to be controlled?

These are just some of the clarifications needed before moving forward with regulation with the Department of Agriculture.

Thank you for your time,

Susan Conard

Ph: 425-870-9118

Email: susan_conard@comcast.net < mailto:susan_conard@comcast.net >

5 V I : 0

From: Valerie Chapman Sent: 4/24/2022 6:51:32 AM

To: DOH WSBOH, DOH Secretary's Office

Cc:

Subject: Thank You for Listening to the Citizens of WA State

External Email

Dear BOH Members,

Thank you for listening to the concerns of us as citizens of Washington State and for voting to adopt the TAG's recommendation to not add the COVID-19 vaccine to Washington's list of required immunizations for child care and school entry at your April 13 virtual public meeting. We are confident that the emerging scientific data will continue to affirm your decision. Thank you for your thoughtful consideration in your role to protect the health of the children in our State.

respectfully, Valerie

Sent from my Samsung Galaxy S22 Ultra

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- M M II I

From: Mary McHugh

Sent: 4/26/2022 6:47:25 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Please delay any decision at this time

External Email

There are most difficult complications due to weather, elevation differences, comparisons of coastal rain forests, and dry desert like conditions in eastern Washington. Cannot make one rule to cover the whole state of Washington.

Please delay any decisions on this matter. I feel it should be a county decision. Seattle does not compare to Okanogan County, rural verses city can have diverse differences. This is not a state wide ruling that can be passed.

Mary McHugh
19 Poorman Cr Cut-Off Rd
Twisp, WA 98867

From: Sherry Baysinger

Sent: 4/26/2022 11:16:07 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal Waste

External Email

We are very concerned with this over-reach into how animal/livestock owners deal with animal waste.

My husband and I are members of Back Country Horsemen of Washington. We have volunteered over 30,000 hours packing tools and equipment to assist the USFS, DNR, ONP and USGS in projects and trail and campsite maintenance in our area of the Olympic Peninsula. We are master trainers of Leave No Trace and continue now into our 70's to teach these practices to our many members.

Unfortunately, most of the people who are concerned about animal waste, especially livestock, have very little experience with livestock. They possibly don't even realize that cow and horse manure is really just recycled grass and excellent fertilizer for farmers (which happens to be in short supply due to recent world events).

The livestock owners that we work with are very well aware of how to compost and utilize manure in ways that do not harm, but rather improve the environment. Perhaps education rather than legislation should be your first line of defence on this issue. Private landowners who have been stewards of farmland for generations will not appreciate someone in uniform from the government who have, no authority by law to tell taxpayers how to care for their own land, for which they pay property taxes (and high ones in Washington!).

Please consider utilizing local Conservation District people within the counties to continue to hold classes on management of mud/manure rather than legislating something that has already riled up a lot of rural farmers and livestock owners. Conservation employees have been very helpful in Clallam and Jefferson counties. We have invited these folks to come to our property and instruct and assist with proper mud and manure management and protecting the stream that flows through our property. I should mention that our conservation folks are also horse owners and are Board members of several Back Country Horsemen Chapters. They have achieved respect for what they do because they are stock owners. I suggest you start with people like them.

Respectfully

Larry & Sherry Baysinger 2094 Bear Creek Rd Port Angeles WA 98363 From: birthsupport@aol.com

Sent: 6/1/2022 12:35:20 PM

To: DOH WSBOH

Cc:

Subject: Immunizations

External Email

I want the board to know that I will NOT accept ANY shot mandates OF ANY KIND!!! The Covid shots are DANGEROUS!! These shots are EXPERIMENTAL and it is DEPLORABLE and APPALLING that you would even consider mandating them or even recommend them!!! Your job is to LOOK AT SCIENCE!!! NOT POLITICS!!!! It is unconscionable that you would ignore the actual science and put children at risk of DYING!!! I WILL NOT ACCEPT ANY SHOT MANDATES PERIOD!!! I will do EVERYTHING I can, to stop you if you ever try to mandate ANY shot for school. The one thing "covid" did was allow the public to see how political your decisions are instead of scientific!! You have destroyed our state with your unscientific and irrational restrictions!! Because of YOU suicide rate is up, drug and alcohol use is up, domestic violence is up, violence in general is up, EVERYTHING has risen because of YOUR DEPLORABLE DECISIONS!! You as a board are not trustworthy at all, and your inability to look at science is very disturbing. YOU HAVE LOST ALL PUBLIC TRUST!!

Amy Westman

From: Tim and Paula Keohane Sent: 4/29/2022 11:51:54 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Comment on proposal

External Email

We are horse owners and land owners living in rural WhidbeyIsland. We purchased vacant land in 1993 with intent on building home for ourselves where we could also have our horses. Our first effort after sale was final was to contact the Whidbey Island Conservation District to ask them to help us develop a plan for locating barn, corrals and pastures so that we could minimize impact and extend gazing months on the 15 cleared acres. We also sought advice on management of the forested acres. That farm management plan which included manure compost facility, subsequently update 3 times, has served us and the land very well. The management of horses waste is not in any way related to management of dog and cat waste. In fact composted horse manure is a valuable soil amendment. Not so dog and cat waste. I ask you to reconsider including horse waste in your Health Department regulation as it will interfere with the existing very successful and accessible to all programs and services existing already through the conservation districts.

At the very least, postpone consideration at your schedule June date. Paula Keohane

Sent from my iPad

From: Joann Reider

Sent: 4/26/2022 4:54:28 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Keeping of Animals

External Email

Dear State Board of Health

Please postpone the draft proposal from June's hearing. Please allow a work group/task force of stakeholders to convene and sort out the concerns.

Some concerns are mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officer), etc.

Please delay the Draft Policy proposal in June. Please get a work group or task force formed to vet out our concerns.

Yours truly,

Joann R. Reider

From: Herendeen, Lindsay (SBOH) Sent: 4/29/2022 11:42:03 AM

To: DOH WSBOH

Cc:

Subject: Fwd: Board Decision on Covid-19 vaccines

Lindsay Herendeen lindsay.herendeen@sboh.wa.gov 360-628-6823

From: Janet Young <antiejan@gmail.com> Sent: Friday, April 29, 2022 11:30:22 AM

To: Herendeen, Lindsay (SBOH) <Lindsay.Herendeen@sboh.wa.gov>

Subject: Board Decision on Covid-19 vaccines

External Email

After listening to all of the Board and TAG meetings, I am pleased with the thorough consideration of the need or not to vaccinate children in our state for Covid-19. I appreciate all of the time each member had to spend in their decision making.

I am very appreciative of the Board's decision not to recommend mandatory Covid-19 vaccination for Washington's school children. This is a very serious subject that parents need to ponder and make a decision for their own children. We do not know the long-term effects of this vaccine in children.

Sincerely, Janet M. Young Maple Valley, WA April 29, 2022 From: Gen Mossman

Sent: 5/20/2022 6:13:41 AM

To: DOH WSBOH

Cc:

Subject: Moneypox Virus

External Email

I'm am writing due to my concern about the Monkeypox virus. I don't know the extent of the concern on this day, however, Title 42 is set to expire on May 23, 2020. With this virus, and the unknown of potential outbreak, is it safe to keep the border open without health and safety checks?

https://www.bbc.com/news/uk-england-london-61449214

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61449214&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C27cc7b4dcb0d49625b0908da3a627b2f%7C11c

Page 10

https://www.nti.org/wp-content/uploads/2021/11/NTI_Paper_BIO-TT <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.nti.org%2Fwp-content%2Fuploads%2F2021%2F11%2FNTI_Paper_BIO-TT&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C27cc7b4dcb0d49625b0908da3a627b2f%7C11d0e2172

https://www.nbcdfw.com/news/local/texas-news/border-cities-in-texas-and-mexico-brace-for-title-42-decision/2973071/

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decision%2F2973071%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C27cc7b4dcb0d49625b0908da3

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decision%2F2973071%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C27cc7b4dcb0d49625b0908da3a

From: monikahancock61

Sent: 4/14/2022 10:40:35 AM

To: DOH WSBOH

Cc:

Subject: for your information



attachments\73475541581F4055_2_5384546451126753895.mp4

External Email

Greetings, a child tells all

Monika Hancock

Sent from my Verizon, Samsung Galaxy smartphone

From: John Kiess

Sent: 5/2/2022 12:29:36 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Rule comment



attachments\EC5FA5B6AD5C458F_EHD comment letter WAC 246-203-130.pdf

External Email

Please see the attached letter from the Washington State Environmental Health Directors.

Thank you,

John Kiess, RS | Environmental Health Director

Kitsap Public Health District

345 6th St., Suite 300 | Bremerton, WA 98337

(360) 728-2290 Office (360) 620-0538 Cell

john.kiess@kitsappublichealth.org <mailto:john.kiess@kitsappublichealth.org> | kitsappublichealth.org

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May 2, 2022

SENT VIA ELECTRONIC TRANSMITTAL

Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

RE: PROPOSED REVISIONS TO CHAPTER 246-203-130, DOMESTIC ANIMAL WASTE

Dear Board of Health:

Thank you for the opportunity to provide comments on the proposed rule. This proposal provides a much-needed update to existing, out of date rule language. The Washington State Environmental Health Directors support this proposed language revision as it will result in a more useful rule that can be utilized by local health jurisdictions if necessary.

We believe that the proposed rule, if used by a local health jurisdiction, will result in better health outcomes as the language provides for clear standards for compliance to protect surface and ground waters which in turn protects drinking water supplies, shellfish resources, and recreational waters. Additionally, the proposed rule language provides clear standards for animal keepers to understand and implement in order to protect public health and natural resources in their own communities.

We support the proposed amendments to WAC 246-203-130, Keeping of Animals. If you have questions or would like additional information, you can reach me at 360-728-2290, or john.kiess@kitsappublichealth.org.

Sincerely,

John Kiess, WSEHD Chair Environmental Health Director

Kitsap Public Health District

From: Garret Hammer

Sent: 3/30/2022 7:46:53 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Issues with proposed changes

External Email

To whom it may concern,

Even though these changes do not directly affect me, at this time. I believe they would be too much added stress on many small businesses that deal with livestock. With the current state of the economy that would be detrimental. I know how much folks rely on agriculture, large and small in the state of Washington and know the people in positions to look after that do not want it harmed, and these changes would harm

Thank you, Garret

From: boobaa920@gmail.com Sent: 4/21/2022 9:20:20 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Re: CR-102, Proposed Rule, for WAC 246-203-130, Keeping of Animals.

External Email

April 18, 2022

Washington State Board of Health

Re: CR-102, Proposed Rule, for WAC 246-203-130, Keeping of Animals.

Good Day

Upon review of the proposal rule, its claim that it "applies to everyone" is misleading. Areas that are incorporated and on municipal water systems, already have regulations regarding livestock (i.e. quantity limits, type of livestock such as chickens, no roosters) and domestic pets (i.e. leash laws, waste disposal and quantity).

As such, it appears the target for this proposed rule would be imposed on unincorporated commercial and private acreage with livestock.

As such, we are of the opinion, that this proposal should fall under the scope of authority of the Washington State Department of Agriculture (WSDOA). The Department of Agriculture's charter provides the agriculture community ensuring agricultural regulations are observed. They work extensively with commercial operations, but their responsibilities range from ensuring food safety to environmental protections for water quality.

They also have the ability to work with land owners who have self-imposed farm plans that regulate animal waste. These plans need to be grandfathered in.

If the regulations under the WSDOA for waste management are insufficient, those should be updated. They have the authority and infrastructure to mandate and enforce the waste management regulations.

The Conservation Districts who submitted this rule making petition, have a charter to engage people with voluntary actions that keep our air, water, soil, habitats, and farmland healthy for all. They should be petitioning the Department of Agriculture for changes, and not the Board of Health.

Regarding the regulations proposed these need to be more specific, if not they are subject to bias by those who implement and enforce.

For examples, Standards for non-livestock:

For land owners with acreage, would land owners be required to pick their field to find their pet animal waste for temporary storage in a water tight container and disposal?

Would land owners be required to fence property to prevent their cats and dogs from migrating to adjacent neighbors? What regulations would be in place, or recourse would a landowner have, if their neighbors deliberately allow, or walk their dogs or cats to defecate on their neighbor's property to avoid collection/containment/disposal? Would land owners be required to sign their property "No Trespassing" to prevent this?

Will domestic pets be restricted from retention ponds, creeks, and rivers on one's property?

Standards for stockpiled waste from livestock:

What is consider stockpiled? Collected for composting? piled up like an equine stud pile? concentrated defecation in a confinement area?

Is all livestock waste to be removed, including poultry, goats, sheep, ducks, if found within the 100 ft setback?

Will livestock waste need to be separated by omnivore (i.e pigs, ducks, chickens) or herbivore, to allow to be composted? And if so, how is the omnivore waste to be disposed of?

Is composted livestock waste allowed to be spread on lands within the 100 ft setbacks?

What criteria will be set to determine if composted waste is acceptable to be spread? And who will make that determination?

What odors need to be controlled? Waste odors, composting odors, animal odors?

What constitutes odor control and at what distance and duration does a land owner have responsibility to control the odor? What device will be used to detect odors?

Will chicken compost be prohibited from being utilized?

Can you specify what pests are to be controlled?

These are just some of the clarifications needed before moving forward with regulation with the Department of Agriculture.

Thank you for your time,

Regards,

Barbara Woo and Scott Bauer

Small acreage land owner

360 435 6923

From: PCCBCH Memberships Sent: 4/29/2022 1:10:01 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: FW: Public Comment - Keeping of animals

External Email

There are many issues/concerns that are unresolved from the last meeting on Monday the 26th of April. I am requesting that you postpone the draft proposal from June's hearing. I suggest that you allow a work group/task force of stakeholders to convene and sort out the concerns of this draft proposal.

Among the many concerns: mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officer), and more.

Please consider these concerns about the "Keeping of Animals" issues.

Thank you,

Ron/Barbara Downing

253-312-1072

Sent from Mail

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Fueres Feeles Weedless

From: Farley Woodbury Sent: 6/3/2022 9:43:16 AM

To: DOH WSBOH

Cc:

Subject: No covid shots for kids!

External Email

To whom it may concern,

Covid shots are not necessary for the health and safety of our children in a school setting. They don't stop infection or transmission and the injuries and side effects of the shots for that age group are outweighing the benefits.

It should be a parental decision to give an experimental covid shot that has not been through proper phase 3 trials to a healthy child. It is not fair to the public and our children to force this shot. I and many parents will withdraw our kids from school if this shot is mandated.

Please consider all of these things when this topic comes up again on your agenda.

Sincerely,

Farley Woodbury

From: Glasoe, Stuart D (SBOH) Sent: 5/10/2022 10:20:00 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: FW: Re: CR-102, Proposed Rule, for WAC 246-203-130, Keeping of Animals.

Stuart Glasoe

SBOH Health Policy Advisor

360-236-4111

From: DOH WSBOH < WSBOH@SBOH.WA.GOV>

Sent: Tuesday, May 10, 2022 6:30 AM

To: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>; Herendeen, Lindsay

(SBOH) <Lindsay.Herendeen@sboh.wa.gov>

Subject: FW: Re: CR-102, Proposed Rule, for WAC 246-203-130, Keeping of Animals.

From: susan_conard@comcast.net <mailto:susan_conard@comcast.net> <susan_conard@comcast.net <mailto:susan_conard@comcast.net> >

Sent: Friday, May 6, 2022 3:43 PM

To: DOH WSBOH <WSBOH@SBOH.WA.GOV <mailto:WSBOH@SBOH.WA.GOV> > Subject: FW: Re: CR-102, Proposed Rule, for WAC 246-203-130, Keeping of Animals.

External Email

Good Day

Upon review of the proposal rule, its claim that it "applies to everyone" is misleading. Areas that are incorporated and on municipal water systems, already have regulations regarding livestock (i.e. quantity limits, type of livestock such as chickens, no roosters) and domestic pets (i.e. leash laws, waste disposal and quantity).

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They also have the ability to work with land owners who have self-imposed farm plans that regulate animal waste. These plans need to be grandfathered in.

If the regulations under the WSDOA for waste management are insufficient, those should be updated. They have the authority and infrastructure to mandate and enforce the waste management regulations.

The Conservation Districts who submitted this rule making petition, have a charter to engage people with voluntary actions that keep our air, water, soil, habitats, and farmland healthy for all. They should be petitioning the Department of Agriculture for changes, and not the Board of Health.

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What constitutes odor control and at what distance and duration does a land owner have responsibility to control the odor? What device will be used to detect odors?

Will chicken compost be prohibited from being utilized?

Can you specify what pests are to be controlled?

These are just some of the clarifications needed before moving forward with regulation with the Department of Agriculture.

Thank you for your time,

Susan Conard

Ph: 425-870-9118

Email: susan_conard@comcast.net <mailto:susan_conard@comcast.net>

From: Natalie Molfino

Sent: 6/1/2022 2:06:21 PM

To: DOH WSBOH

Cc:

Subject: For 8 June

External Email

Dear BOH,

Although adding Covid shots to the school schedule is not on the upcoming June 8 agenda, we need you to understand that we will never forget the terror you caused WA families these past couple years! You will need to significantly increase your efforts to be sincere, open, and truthful henceforth to ever regain our trust. You would be wise to consider beginning with an apology and remind us all that you exist to serve us!

Because of your actions these past couple years, you have lost credibility!! Covid shots are not safe, nor are they effective. We know hockey players who took the vaccine and whose hearts were permanently injured, and the hockey players are no longer permitted to even skate. You are destroying dreams! Do not be complicit in this diabolical initiative. Our older friends who took the vaccine are more sick than ever when faced with any illness, and they now have new, aggressive diseases since taking the covid vaccine.

Before this Friday, June 3, please READ this information on the Covid vaccines NEW on the NIH website: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9062939/https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ncbi.nlm.nih.gov%2Fpmc%2

Lastly, we want you to know we support agenda item #13, the citizen petition for rulemaking . Administrators of this vaccine MUST provide complete information to recipients so they can form informed decisions (whether consent or refusal). Remember, you work for us and must begin being honest TODAY!

Thank you!!

From: DOH WSBOH Sent: 4/4/2022 8:16:49 AM To: DOH WSBOH Proposed Animal Waste Rule	
Cc: Subject: FW: Keeping of animals rule. WAC 246-203-130. public comment.	
Good morning Stuart,	
Forwarding you a public comment below regarding KoA.	
Nathan Thai	
Communications Consultant	
Washington State Board of Health	
Nathaniel.Thai@sboh.wa.gov <mailto:nathaniel.thai@sboh.wa.gov></mailto:nathaniel.thai@sboh.wa.gov>	
360-463-8928	
Website https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.facebook.com/?url=https%3A%2F%2Fwww.facebook.com/?url=https%3A%2F%2Fwww.facebook.com/?url=https%3A%2F%2Ftwitter.com%2FV%2FV%2FV%2FV%2FV%2FV%2FV%2FV%2FV%2FV	om%2FWASBOH8
From: shoer joe <joemarce@gmail.com> Sent: Friday, April 1, 2022 8:02 AM To: DOH WSBOH <wsboh@sboh.wa.gov> Subject: Fwd: Keeping of animals rule. WAC 246-203-130. public comment.</wsboh@sboh.wa.gov></joemarce@gmail.com>	
External Email	

Sent from my iPhone

Begin forwarded message:

>	From: Steve McLaughlin <mclaugsa@yahoo.com <mailto:mclaugsa@yahoo.com=""></mclaugsa@yahoo.com>
	Date: March 28, 2022 at 10:05:26 PM PDT To: shoer joe <joemarce@gmail.com <mailto:joemarce@gmail.com=""> > Subject: Re: Keeping of animals rule- public comment.</joemarce@gmail.com>
	□Excellent!
	Sent from my iPad
<mail< td=""><td>On Mar 28, 2022, at 17:21, shoer joe <joemarce@gmail.com to:joemarce@gmail.com> > wrote:</joemarce@gmail.com </td></mail<>	On Mar 28, 2022, at 17:21, shoer joe <joemarce@gmail.com to:joemarce@gmail.com> > wrote:</joemarce@gmail.com
	To whom it may concern:
alway	I'm a cattle rancher here in Jefferson county Washington. My family has raising cattle here since the mid 70's. Although my animal husbandry practices are s improving, I have a few questions and comments that may concern other large mall livestock owners and producers.
is and them	There is a proper department already educating and enforcing these rules. Is the DOH getting involved? The county conservation district is the department that should have jurisdiction on this matter. They help owners of livestock and educate on better practices. They also work with the department of health and the summental protection agency to name a few.
	In my opinion most livestock owners and producers have a large part in ng water clean and their land healthy. Clean water for our animals and healthy land se them on is important to most.

- 1) why and what good comes from penalizing hard working people that work hard and care for these suspect animals? Targeting small business in our county only hurts our economy. Education is key here.
- 2) why is the DOH involving the dept. on such matters when there are other depts. already in place to target the such concerns of animal Waste.
- 3) has the DOH reached out to farms or ranches in our county to discuss the matter from a real world perspective? If not, than you've already made the first mistake on this rule.
- 4) has anyone analyzed how much of our local economy depends on agriculture in our county? And how much ag creates in materials, local revenue, and land taxes being payed to the county?

In closing my public comments, I'm disappointed to hear of another rule to stifle our agricultural community. Putting fees on hard working people only hurts the ag industry in our county and community. Education and assistance is the way to combat these concerns of the DOH. I urge the county to talk to local livestock owners and livestock businesses to create a better solution than fees and control.

Please email me back with any concerns you may have. I would enjoy being a part of a better solution on the matter.

Joe Marceau

joemarce@gmail.com <mailto:joemarce@gmail.com>

Sent from my iPhone

France Character

From: Sharon x

Sent: 6/1/2022 1:01:52 PM

To: DOH WSBOH

Cc:

Subject: No to K-12 covid or any manditory vaccinations

External Email

Hello and thank you for reading.

I am once again reaching out to ask the doctors and other science types to please within the WA BOH, please pay attention to accurately and ethically collected data regarding these Covid-19 shots, efficacy and side effects. These are medical people with zero financial gain - you have heard about them being censored - before even engaging in the very ethically collected data . That I feel the need to send this correspondence erodes my faith in WA State BOH to keep Washingtonians safe. Many parents, including myself, are aware of the true scientifically collected data and will refuse to accept unethically, profit-based data collection to keep us safe and healthy.

This absolutely carries over to any mandates for K-12 students, which has been in the forefront lately. With all the push for a product that is still in EUA to be forced on young kids - a population not affected by Covid-19 - I as a parent looking at the past two or so years have lost all faith in the Washington State Department of Health and Board of Health to medically make sound advice for myself and my family for Covid-19 shots, monkeypox shots or absolutely any other shots.

Personally, i have heard too many random and unusual stories about side effects after receiving the Covid19 shot and know there are thousands more for each one posted here:

- *one woman having two heart attacks two months in a row
- *one healthy middle aged man needing a triple bypass heart surgery
- *one young adult with no family history developing diabetes
- *one healthy in body and spirit woman getting breast cancer
- *one older person getting brain blood clots consecutively after receiving the shot and lead to her death (sadly, this is my cousin, and my heart aches)

I am urging you to use your strong sense of ethics, true data not backed by profit-making corporations, and make an ethical stance regardless of popularity and NOT make the Covid19 shots mandatory for K-12 kids to attend public school. We parents are following and ready to do whatever it takes to preserve our freedom of choice and our own call to keep our families safe.

Thank you, Sharon Hochberg resident of Redmond, WA _____

From: SONDRA JOHNSTON Sent: 4/26/2022 1:34:16 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Draft policy proposal

External Email

Delay any final recommendations till sometime 2023 to allow complete study of issues without a rush job so all concerned citizens can be heard

Sent from my iPhone

France Jackson Allan

From: Joshua Allen

Sent: 4/23/2022 1:10:57 PM

To: DOH WSBOH

Cc:

Subject: Re: CR-103E Alert: Emergency Rule Adoption, Chapter 246-101 WAC -

Notification and Reporting of COVID-19

External Email

https://rumble.com/v11qyc1-interview-with-josh-yoder-re-american-airlines-captain-bob-snow-vax-injury.html <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Frumble.com%2Fv11qyc1-interview-with-josh-yoder-re-american-airlines-captain-bob-snow-vax-injury.html&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd9063ffeaaa7498a5e1408da2565563b%7C11

Sent from my iPhone

On Apr 23, 2022, at 1:05 PM, Joshua Allen <joshicloudz@icloud.com> wrote:

☐Yoreally are the most evil tyrannical form of oppression and discriminatory body across the board top to bottom. You must be aware of the situation by now and are flat out ignoring the facts. There will be a place for the evil agendas You have ushered in by not listening or care to concern, what over 20,000 physicians have stood against world wide. Unreported facts deaths and the increase of children ADE. Obviously, Have no worry to you. Must be pald off can be the only conclusion! For your crimes on these measures will be studied for generations to come. How can they get It so wrong?

The health board sly under peoples noses you are passing and changing laws for big Pharmas monopoly and you are massively corrupt. There are so many resources available outside the for profit CDC and FDA. Whom are both unreliable false retractable non science based oligarch selfish conclusions. So many examples of facts that dosen't matter the evidence I can provide but you are the rulers on matters here. Where I am a regular Joe researcher and citizen; No brainer for me to research want the truth then seek the truth. Can find the atrocities, crimes. Clear as day by the manufactures themselves, patents, the research studies flawed and haulted, plus the CEOs of these companies their own admissions of this lie you are holding on too! If I can find these facts review 100s of official documents released by the courts CDC and the WHO you are not professional at all to raise your own questions about the safety and effectiveness of the fake vax or as the SEC filings state from bio n tech and PHIZER, Moderna, JnJ, Aztrazenica they are gene therapies. These experimental applications have not only caused more deaths and ADE than the year prior with no vaccine available The CEO of Phlzer not even a MD he's a veterinarian. The science about the entire gambit of lies has so may layers that you must know you are dictating and murdering The people who's health you are n a position to protect. Get a Life retards snd leave ours alone you pricks!

On Apr 21, 2022, at 2:36 PM, DOH WSBOH <WSBOH@sboh.wa.gov>

wrote:

The Washington State Board of Health (Board) has adopted a seventh emergency rulemaking order to continue the requirements established in WAC 246-101-017 – Novel Coronavirus (SARS-CoV-2), Coronavirus Disease 2019 (COVID-19) Reporting. The emergency rule is effective April 20, 2022 and will be in effect for 120 days. The CR-103E announces the emergency rulemaking order, filed as WSR 22-09-082 (attached).

This emergency rule, in alignment with updated guidance from the Department of Health and Human Services <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2Fncov%2Fdownloads%2Flab%2Fhhs-laboratory-reporting-guidance-508.pdf&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd9063ffeaaa7498a5e1408da2565563b%7C11d0e

- * Continues the designation of COVID-19, as a notifiable condition.
- * Continues the requirement for health care providers, health care facilities, laboratories, local health jurisdictions, and the Department of Agriculture to report certain demographic, testing, and other relevant data for each COVID-19 test.
 - * Clarifies reporting requirements by test entity and test type:
- * Entities licensed to conduct moderate or high complexity testing must report all positive, negative, and inconclusive test results from all NAAT and antigen tests performed for COVID-19.
- * Entities licensed to conduct waived tests under a certificate of waiver must report positive test results from all waived tests, excluding antibody testing, for COVID-19.

The Board filed a CR-101, Preproposal Statement of Inquiry, on July 23, 2021 to integrate emergency rule requirements and provisions into permanent rule. More information can be found on the COVID-19 permanent rulemaking web page. <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2Fnotifiable-conditions-covid-19-permanent-rule&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd9063ffeaaa7498a5e1408da2565563b%7C11d0e217

For more information on this emergency rule visit the Board's website <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2FRulemaking%2F%2Fsboh.wa.gov%2Fxboh.wa.g or contact notifiableconditions@sboh.wa.gov <mailto:notifiableconditions@sboh.wa.gov>

Thank you,

<image001.png>

Phone: (360) 236-4110

Mailing Address: P.O. Box 47990, Olympia, WA 98504-7990

Location

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplaceton.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fwww.google.com%2Fmaps%2Fwww.google.com%2Fwaps%2Fwww.google.com%2Fwaps%2Fwww.google.com%2Fwaps%2Fwaps%2Fwaps%2Fwww.google.com%2Fwaps%2Fwa 122.9083621%2C17z%2Fdata%3D!3m1!4b1!4m5!3m4!1s0x549173f074205aa3%3A0x552ddc5f79ee44b6 122.9061681%3Fhl%3Den&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd9063ffeaaa7498a5e1408da2

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- <mailto:wsboh@sboh.wa.gov?subject=Please%20Add%20My%20Name%20to%20the%20WSBOH%20Em

<WSR2209082-covidreporting-7thCR103E.pdf>

France Kaller Ball

From: Kelly Bell

Sent: 4/26/2022 7:58:40 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Constituent comment

External Email

Please postpone the June ruling on the draft proposal in favor of empaneling a stakeholder task force to further explore and inform the group on the issues at hand. As an agriculturist and smallholder who is faced with increasing encroachment on our farmlands by urbanites who have little understanding of farming practices and who bring urban values with them without regard for the values they're displacing, I recognize that rural folks have a diminished voice in this process. It's important that you take the time to thoroughly consider our traditions and values, as well as our basic needs and livelihoods, in making these critical decisions which will disproportionally affect farmers and livestock-holders, many of whom are economically disadvantaged.

Thank you for listening,

Sincerely, Kelly Bell (917) 446-1555

Ovis Aries Farm ARBA-Registered Romney sheep @OvisAriesFarm | @Kelly | @YARNSPOTTING Francis Tanana Databilia

From: Tenney, Patricia Sent: 5/2/2022 9:07:10 AM

To: DOH WSBOH Proposed Animal Waste Rule

Subject: FW: CR-102 Proposed Rule Alert: Keeping of Animals (WAC 246-203-130)

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External Email

Representative Dent and some of his colleagues would like to submit this letter of support for the Keeping of Animals Rule. Please let us know if you need anything else.

On Behalf of Representative Dent.

Best Regards,

Patricia Tenney

Senior Legislative Assistant

To Representative Dent

House of Representatives

437 John L. O'Brien Building

PO Box 40600

Olympia, WA 98504

Telework (509) 941-2346

Any other relevant information, including your legislative website

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.facebook.com%2Fwahouser.com/

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NOTICE OF PUBLIC DISCLOSURE: Please note, this email and any documents you send this office, may be subject to disclosure requirements under the state Public Records Act, RCW 42.56.

From: DOH WSBOH <WSBOH@SBOH.WA.GOV <mailto:WSBOH@SBOH.WA.GOV >

Sent: Monday, March 28, 2022 3:27 PM

Subject: CR-102 Proposed Rule Alert: Keeping of Animals (WAC 246-203-130)

CAUTION: External email.

The Washington State Board of Health (Board) has filed a CR-102, Proposed Rule, for WAC 246-203-130, Keeping of Animals. The proposed rule includes a title change to Domestic Animal Waste. The proposed rule includes standards for the handling and disposal of animal excreta, or animal waste, for the purpose of preventing and controlling nuisance and health hazards.

The CR-102, filed as WSR 22-08-003, announces to the public that a rule is being proposed and includes the proposed rule language. The CR-102 is attached and related material can be accessed at the Board's rulemaking page

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2Frulemaking%2Fcrules-and-activity%2Fkeeping-

animals&data=05%7C01%7CWSBOHProposedanimalwasterule%40sboh.wa.gov%7Cb6bcc7c5b6bb463fb0d

You may submit your comments on the proposed rule the following ways:

- 0. Written comments are accepted through May 2, 2022, using the following options:
- Send to the Board's public comment email address for this proposed rule: WSBOHProposedAnimalWasteRule@sboh.wa.gov
 <mailto:WSBOHProposedAnimalWasteRule@sboh.wa.gov>
 - 2. Send via U.S. Mail to:
 - 0. Washington State Board of Health PO Box 47990 □OlympiaWA 98504-7990

Please Note: All written comments submitted to the Board will be considered part of the official rulemaking file, provided to Board members for their consideration, and will be posted publicly to the Board's website.

0. Verbal comments will be accepted on June 8, 2022, during the online rules hearing open to the public

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2Fmeetings%2

08&data=05%7C01%7CWSBOHProposedanimalwasterule%40sboh.wa.gov%7Cb6bcc7c5b6bb463fb0d508d

beginning at 1:30 p.m.

 Access and register for the online rules hearing: https://us02web.zoom.us/webinar/register/WN_6vqdRyUmTamyb61z3wCSBA https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fus02web.zoom.us%2Fwebinar%2

Important Information for the Rules Hearing:

- * The online rules hearing will be held via the Zoom Webinar platform
- * In order to give verbal testimony during the rules hearing, you will need to access the meeting using your computer, laptop, or device. Your computer, laptop, or device must have speakers and a microphone.

For more information regarding this rule revision please:

- 1. Visit the Board's Keeping of Animals rulemaking web page <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2Frulemaking%2Fcrules-and-activity%2Fkeeping-animals&data=05%7C01%7CWSBOHProposedanimalwasterule%40sboh.wa.gov%7Cb6bcc7c5b6bb463fb0dor
- 2. Email Board staff at stuart.glasoe@sboh.wa.gov <mailto:stuart.glasoe@sboh.wa.gov > .

Thank you,

(360) 236-4110

P.O. Box 47990, Olympia, WA 98504-7990

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This announcement is being sent to the Board's general distribution list and other distribution lists associated with this rulemaking. Please excuse any duplications.

CAUTION: This email originated from outside of the Legislature. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: Denise Haan

Sent: 4/26/2022 5:13:16 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: comment

External Email

Hello,

As an animal owner I am aware that there are many issues --important to concerned citizens and groups-- that have as yet been worked out re: the proposed rule. These concerns include why there is mixing of livestock oversight with non-livestock (doesn't seem to make any intuitive sense), overreach in terms of rules on stockpiling and composting (and the \$\$ that would incur), unforseen complaints from urbanites who move into rural areas and are 'surprised' to find livestock, let alone wildlife ('why don't you all just shoot and kill the coyotes, bears, racoons, etc.?") in the area (I live in such an area), and leaving enforcement up to a local health officer (who may have limited to no knowledge about livestock) (I teach public health at the university level and livestock issues are not a primary focus of ANY public health degree program). Given this and other issues, it seems best if you all delay addressing the draft proposal in June's hearing and instead convene a work group to sort out the various concerns and bring recommendations to your group. That way you're not "unmaking" rules down the line. Thanks.

Denise Haan

From: Cathy Johnson

Sent: 4/26/2022 2:26:23 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: comments on this proposed rule

External Email

I am a member of Back Country Horsemen of Washington and an owner of 3 horses that are kept at home on our 5 acres. I am very concerned that this animal waste proposal language has many issues that still need to be clarified. I am especially concerned about the language on composting manure, the risk of complaint abuse from urban neighbors and that there is no uniformity of enforcement.

I recommend that this proposal be put on hold while a task force is convened to deal with these remaining issues.

Cathy Johnson

2412 284th St. E Roy, WA 98580

From: Machelle Lewis

Sent: 6/2/2022 7:07:14 AM

To: DOH WSBOH

Cc:

Subject: Covid poison for kids

External Email

I am very concerned that you are contemplating requiring a covid jab requirement for school age children. All of the jabs are still in an experimental phase and why would you consider requiring this? Neither our children or us are lab rats and I would definitely be against requiring this before attending, teaching or volunteering at school. You need to do some authentic reasearch about this so called medication and also peer reviewed studies about masking.

Sincerely, Machelle Lewis

From: Daniel H

Sent: 4/22/2022 11:58:09 AM

To: DOH WSBOH

Cc:

Subject: A. Clark Disciplinary Hearing

External Email

I'm wondering when the disciplinary/final hearing for Amelia Clark of SRHD is scheduled for? I'm also wondering if this meeting will be online and viewable by the public.

Many Spokane residents have been following this case diligently, and we could use more information about the official findings of the board.

Thank you, Daniel Henry Spokane, WA, 99212 ______

From: Omar Rodriguez

Sent: 5/16/2022 12:49:35 AM

To: DOH WSBOH

Cc:

Subject: Commit to no COVID vaccine mandates on children

External Email

Dear Washington State Board of Health,

I urge you to accept the TAGs recommendation and choose to NOT mandate covid vaccines on our children. Our state government should NOT be mandating Covid vaccines on our children. They are at extremely low risk for Covid and these medical decisions should be left in the hands of parents and their family doctors.

Sincerely,

The Citizens of Washington State

From: Doan Sovon

From: Dean Sevon

Sent: 5/22/2022 11:03:45 PM

To: DOH WSBOH

Cc:

Subject: Covid Vax for children WAC -246-105

External Email

This is absurd! It hasn't been properly tested for children, it could even be more dangerous than the current strand we're dealing with. You are beginning to turn Washington into California. I do trust you saw what happened to the School Board members in San Francisco!

Thank you for thinking,

Dean Sevon

425 626.9876

Sent from Mail

< https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2Ffwlink%2F%2Fgo.microsoft.com%2Ffwlink%2Ffwlin

From: Darrell Wallace

Sent: 4/27/2022 12:30:00 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Proposed Animal Waste Rule

External Email

Your proposed Rule is deeply flawed. I support efforts to delay passage and form a work group to resolve the issues.

--

Darrell

- P. I

From: linda m

Sent: 4/26/2022 10:33:07 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Domestic Animal Waste

External Email

Many issues/concerns are unresolved. We are requesting they postpone the draft proposal from June's hearing. We suggested they allow a work group/task force of stakeholders to convene and sort out the concerns.

I'm 72 years old. I've had one to two horses all my life. I've very carefully budgeted my money so I could continue the life I grew up loving. Horse manure is organic, its grass and water. Don't ruin my life now that I am retired and can camp a little and enjoy my horses more then when I worked full time and raised a family.

From: Executive Producer VR Films

Sent: 5/23/2022 4:59:32 PM

To: DOH WSBOH

Cc:

Subject: 2) Re: ZOONOTIC DISEASE-& Ric Browde Kitty Block



attachments\C3B1157B647A4BEC_IMG_4950.jpeg

External Email

RickBrowde is registered in Seattle

This is what they've done to Texas One of the worst deadliest virus outbreaks in Texas history records are included

These pets were then shipped to your state

HSUS Kitty Block, Wings of Rescue Ric Browde & Operating Partners LASPCA Ana Zorilla, ASPCA Matt Berkshader caused the biggest Distemper outbreak in Texas history.

Canine infectious respiratory disease (CIRD)

Dog Flu same variant Bird Flu

Dogs & Cats Coronavirus

Human Transmission

After hurricane Laura ASPCA received pets from Calcasieu Parish those pets were shipped out only days after the hurricane made landfall.

Pets were received from Ana Zorillo LASPCA. HSUS coordinated the shipments into Texas HSNT where Susan Guliq is the director.

Hurricane victims that try to retrieve their pets from Calcasieu Parish were turned away and told to go on the Internet to find their pets.

Those pets were lost forever after they were shipped into Texas. Rick Browde Wings of Rescue is the shipper for both ASPCA and HSUS.

Their records show Pets with (CVD) canine infectious respiratory disease being flown across state lines.

Update Thursday, March 3rd The CDV Outbreak Kitty Block HSUS, Ana Zorilla LASPCA, Ric Browde Wings Of Rescue caused in Texas continues to spread like wildfire across Texas.

https://www.news9.com/story/62215159b062700729bbd823/tulsa-animal-welfare-deals-with-cases-of-distemper-virus

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.news9.com%2Fstory%2F62 animal-welfare-deals-with-cases-of-distemper-

virus&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e21

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https://lh5.googleusercontent.com/vx-8I1JA34U_jKiNXMrht_uIAQk72Ghba-hGSWULACRpjDK55oa8tfOf6ZMRG16us5hiBWBGuuE8xr39ddb5LEIQqz1fwE7-D2wfpzaMPt66HkHV6A7INZD2oday0FwmEYAWNsIMIFP1cCfbg>

The Shipments of lost pets from hurricanes shipped by LASPCA, Ana Zorilla, Bernard Unti, Kitty Block HSUS with Distemper caused the biggest outbreak in Texas history only to proceed the NRG arena 400 dogs with Distemper flown across the nation by HSUS ASPCA shipper Ric Browde Wings of Rescue and Adam Lamb BVSPCA.

A nonprofit that takes in donations to save pets but repeatedly causes those pets harm has committed fraud.

Greed driven nonprofits ship people's lost pets from hurricanes as a publicity stunt to raise donations.

The directors of nonprofits are spreading deadly viruses throughout the nation resulting in the death of thousands of people's pets and pets residing in the shelters where they dump peoples pets Lost after Disasters.

"The corrupt nonprofits are not "saving animals" they are causing their Deaths

C5aH_Q8LsLfPdPBFzj4EhjCp6AYXW3CJ1IsRG6iwJm99BADNINl6KBj0XTkQWF5s41AOAccX0nB6aMGvY17C1JzO06_B_g>

HSNT Doctor of veterinary medicine Christina Jaramillo has a long history operating with the most corrupt organization, The Humane Society of the United States.

HSUS used St Hubert's animal welfare to dump tens of thousands of pets. This is the second highest kill shelter in New Jersey.

This is an incestuous group of corrupt Individuals who have operated together since Hurricane Katrina.

Additionally Heather Camisa was the director of St. Hubert's animal welfare; she came from HSUS.

HSUS reach is wide; they sink they're tentacles in every shelter across the nation so that they can use those shelters to dump pets from disasters. This gimmick raises hundreds of millions.

The veterinarian came from the HSUS Partner in New Jersey to the HSUS Partner in Texas.

July 2021 Outbreak

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mTBpuUWe62ki1zhr5EELJ2E5SeiAFlWpVL2aAA0N_Xku_7QdxXvFlnN8o6FzBBhIhucMIohXomFU7fb4BXjF2yYi
HrabcEs0liA6BRxdEN-obeDm1ZYl_TQ>

pets caring diseases shipped across state lines

Shipper Ric Browde Wings Of Rescue,

Ana Zorilla LASPCA

Kitty Block HSUS

Dozens of outbreaks have been traced Kitty Block HSUS & HSUS Shipper Ric Browde.

July 2021 Distemper Outbreak

https://lh5.googleusercontent.com/mOXguzP47wtTNJZo7gRt_KD1QDvgEJ77-8G8w-xdUIuSUTDCefBlt3RTIvk1C7BniwO7ak-19Evu-

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 $< https://lh4.googleusercontent.com/xRBkpaGOeW5Ggb8aMZfmVrvgWnyCHIbR1IyCVNTf9vl2pIZ7kHyG37yTi_q0aGUHP6s0VMK64k5cBGrYSa1F1GXAPDfdpA>$

Texas stray or lost pets will have to fend for themselves after they allowed deadly viruses to be brought into the shelter by the Corrupt Nonprofits profiting from the Disasters.

Payoffs can range from about 5000.00 to 250,000 for directors of shelters.

Directors allow big nonprofits to use their shelters to dump pets; they've raised millions of dollars by deceiving donors.

The Distemper virus begins spreading throughout Texas

July 6, 2021 Outbreak Houston Texas

https://lh3.googleusercontent.com/e0lD1hS7_cDRYWjN66_WqY2J7d2UlGISC1EKlGJxn4b-z_9d1h2CcrhNm0X6Ly74EsO2hI8UzWRhlNSUvSDZeYc5kRH2lgch-UWA7bKa0eqDodKU46lfjh790c9iDqA0YDpOWcMBotlsXO6D1Q>

By July 18 Dogs with Distemper are being shipped all over the nation by reckless Nonprofits

July 29, 2021 outbreak Amarillo Texas

https://abc7amarillo.com/amp/news/local/distemper-outbreak-across-amarillo-causes-change-to-shelters-surrender-adoption-policy

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fabc7amarillo.com%2Famp%2Fnewoutbreak-across-amarillo-causes-change-to-shelters-surrender-adoption-policy&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e21

jKvW1CCnGhAffBBRE_sac5hCZ45HujyNZHuBxkdXJHyfFrPXQQud9VRKR-ZRqOIw5vi4kLFMHlSvEGVF4uoYhhxX7AvmqkSA3GR8jWjUcw>

https://lh4.googleusercontent.com/eE4090L1EHvM7mPZrfPszTlmZmccW8v6TsftA1CZzX451CiNWH1wEJtT

Outbreak Bastrop county Texas

July 2021

HSUS Was under Criminal investigation after Hurricane Katrina for the same criminal actions they committed after Hurricanes Laura, Ida, Barry and Michael, shipping Disaster Victims Pets out of state. Raising donations on Disaster victims pets they're scattering across the nation and displacing pets even further from home,

Complaints have been Filed with Criminal Investigators in three states. HSUS knew there was an inquiry from the attorney general Office in Louisiana so they were very sneaky during hurricane Ida and operated under Tim Kunan never stepped foot in Louisiana however they raised Donations.

HSUS Operations were suspended during hurricane Laura and and St. Landry Parish they operated again without an MOU As described by Van Reed Director of emergency preparedness HSUS had no business operating in St Landry Parish.

Additionally HSUS Caused Another

DISTEMPER OUTBREAK in St. Landry Parish.

HSUS BVSPCA

https://lh4.googleusercontent.com/AfYyU3OCaSIGr6xLUIMFy2ZG2nLGdb0-HQx0iFpocMLt0p5L7f_7gT6ZIQDPK1FOiCcWrq0_jj0gZxa-9Dzz02_wbXuGDOQcFfF-v2UY8X 7WLBYoxuxqRHs388Y-CVdPtDe5mTYEEGU75ApUq>

LASPCA HSUS Operated together Shipping Sick Dogs away from their homes from Calcasieu Parish after Hurricane Laura and into

The Humane Society of North Texas

https://lh3.googleusercontent.com/uWoWSQ1WiQY3QXSI1g8inxFGuw9tFzrgmQjFBA56yPI30ekskIno_8Nea33-flt15tscLSSPHXt12027AH9Qdw

https://lh6.googleusercontent.com/OMi8mCmIQyLuGtam6wnsDiKIZX7GmPq2Rl9NyxsA43wYwV24C0pLfW9ZrLl-GmWi8wGkRSVutMg>

"https://dx.doi.org/10.2016/10.2

"https://lh6.googleusercontent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqp_AmAD7w2wu3d4NnmFPm4J6ovZ2iX2-GXrc1ofkK0F55BYGd5VDFfdQPrxC62sU-QtOnF-7vYOqNo9EvWDrG9d4jQ>"https://lh6.googleusercontent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqp_AmAD7w2wu3d4NnmFPm4J6ovZ2iX2-GXrc1ofkK0F55BYGd5VDFfdQPrxC62sU-QtOnF-7vYOqNo9EvWDrG9d4jQ>"https://lh6.googleusercontent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqp_AmAD7w2wu3d4NnmFPm4J6ovZ2iX2-GXrc1ofkK0F55BYGd5VDFfdQPrxC62sU-QtOnF-7vYOqNo9EvWDrG9d4jQ>"https://linearcontent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqp_AmAD7w2wu3d4NnmFPm4J6ovZ2iX2-GXrc1ofkK0F55BYGd5VDFfdQPrxC62sU-QtOnF-7vYOqNo9EvWDrG9d4jQ>"https://linearcontent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqp_AmAD7w2wu3d4NnmFPm4J6ovZ2iX2-GXrc1ofkK0F55BYGd5VDFfdQPrxC62sU-QtOnF-7vYOqNo9EvWDrG9d4jQ>"https://linearcontent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqDixent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqDixent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqDixent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqDixent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqDixent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqDixent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqDixent.com/G9vfK_L6zMn]xvqwwAhhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqDixent.com/G9vfK_L6zMn]xvqwwAhraUr9I3B78ugQDjzc7tP-EMNCi2gCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixent.com/G9vfCsIXbYPqDixe

August 2021 Distemper Outbreak

https://www.seattledogspot.com/texas-dog-rescue-causes-distemper-outbreak-in-northwest/

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.seattledogspot.com%2Ftexadog-rescue-causes-distemper-outbreak-in-

northwest%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C

https://lh3.googleusercontent.com/cNEtoPB9ulpSnzXU5CclE9bHW6HYv2J61qYrC-

XMZsy3egBZoa VHEc5mSVmS8e4nvvd6XOM 55Unt3OGfpZzE5IBH8GvZrv6QWRHDzQh xs-

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PDQ7VhiKl6nn2MI6mZxyGfLIHRgL3KgAmFFW1fBx60lIA15SMK_TF_uGfWoKVKRXIS8a_ys6QL1NKYS3MHbcP<https://lh6.googleusercontent.com/GYmO-

_WdZblVi19cXuORqkDUijCKTAhFltzNKDv32McJdMZDJ5FmPGJViU9Ax9T86w0crkxbCih05klshKzOopfFg1a5zYAhGl-Dv8bm7qeNqQyQbVInE3qg> https://lh5.googleusercontent.com/wC47n4GDtgsOeZq004GJiflzaH903Xf8L2LWwABG7S7E1Gx1N56cBRtZ

iUg9Uk-Z9hY9qP6QjmtBdAchm3dcI1GYhf7PtRRRPK776x5RTCsyxQFg>

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Av3twAYOZLPctWDkXUyw3HTDdcsN92I W7-iZR fsGOQ>

https://lh5.googleusercontent.com/AgG02kRC5IbakG-Xz1K_Sz5xwKmnkXkpgeKKr-

vtsOktz2e9qFfZ1z41724SPtkn2jMGeC_eq8wzO9E0BgazNKAlAS6xV7hevJEmHe3333sHCbeRmfQMpM2nbf2VE

https://lh6.googleusercontent.com/r1JDCX1AYc15LMr9OBZd5IM-ftEbmmMxv8Vw-

7ZEirj2ddymMrYYMSkwDrjtYYy9EfRfhQpGJ4QMn8RlmcwWeAozd-beNRR0-

YkNYMws5HHcfmP szjkwGNFAIQ0yfE1DJ18Yty15CUF0MTHYQ>

https://lh3.googleusercontent.com/Gu6Z8zarxFn_6hkxDDOKNO5pLTtzUSMMm47_H3tsZpwIJ3uv5_6KJfW

https://lh5.googleusercontent.com/3Lgg|C6mONRPNMeIm6WMAFAowaFh3Fiiy4PsXd3EbAknaOErfsWUmK9DCT7Qk62vskVTtNk1ekabFa|GGJJ_w53CVaihhZML20mBQzW1F_PmNtm1Iyg

https://lh4.googleusercontent.com/gFyeTdIxNdVBhAwY6Lk5mhe5BnupMgZnZc1aXfA0wRWKXTGhAGAnPE

https://www.wfaa.com/article/news/local/overcrowding-possible-viruses-and-fireworks-fort-worth-area-

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.wfaa.com%2Farticle%2Fnewpossible-viruses-and-fireworks-fort-worth-area-

&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264

NBC reported Texas as a high kill state for pets. Why are nonprofits dumping more pets into a high kill state?

https://lh5.googleusercontent.com/TuY55PpDDAvBY2_YNLDeHWT5AKShvQn71nOI3whZq67-h2xhE0Q_9S8SuGdJSIxC_eMmFXirXSnZZgBkbRnCIkCUaclC3EaTPoynyBtMi8Mt2FS5G5ncciLimieipnmq3NVu

The shipper is Rick Browde, Wings of Rescue.

LASPCA - HSUS - Wings of Rescue Caused the Worst Distemper Outbreak in Texas History after Dumping Families Lost Pets carrying Diseases into Humane Society Of North Texas.

https://www.fox4news.com/news/humane-society-of-north-texas-cancels-mega-pet-adoption-event-due-to-distemper-worries

< https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.fox4news.com%2Fnews%2Fociety-of-north-texas-cancels-mega-pet-adoption-event-due-to-distemper-

worries&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e

Distemper or Spread throughout Texas

https://www.nbcdfw.com/news/local/humane-society-continues-to-work-with-medical-officials-to-control-distemper-cases/2677362/

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.nbcdfw.com%2Fnews%2Flowsociety-continues-to-work-with-medical-officials-to-control-distemper-

cases%2F2677362%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d1

BARC animal shelter closing this weekend due to upper respiratory illness outbreak

https://www.houstonchronicle.com/news/houston-

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.houstonchronicle.com%2Fnewdata=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.houstonchronicle.com%2Fnewdata=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.houstonchronicle.com%2Fnewdata=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.houstonchronicle.com%2Fnewdata=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264">https://gcc02.safelinks.protection.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264">https://gcc02.safelinks.protection.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264">https://gcc02.safelinks.protection.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264">https://gcc02.safelinks.protection.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264">https://gcc02.safelinks.protection.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264">https://gcc02.safelinks.protection.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264">https://gcc02.safelinks.protection.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264

Pets Carrying Distemper Missing from Hurricane Laura were flown into the Humane Society Of North Texas by Corrupt Nonprofits Rick Browde Wings of Rescue Shipper for Matt Berkshader ASPCA and HSUS.

HSNT was housing nearly 1000 animals before they arrived. Families we're still searching for their pets back in Louisiana

The Distemper is now sweeping through Texas it is the Worst Distemper Outbreak in Texas history

Dogs and cats arrive by HSUS Shipper,

Rick Browde Wings Of Rescue.

Pets can be seen on tarmacs in direct sunlight with no water and Displaying signs of extreme thirst. The extremely young, elderly and sick pets have an increased risk of death. Pets were packed so tightly there was no ventilation on the Wings Of Rescue airlifts.

https://lh5.googleusercontent.com/JEODSrabMrlSgXgQ_gkAZ94kS6AaYCD-b0InHAjD_yWxfkVotNBWPk_bC0hsgoboioS0LrEaHBjcYwDpXpBLLUJW6LVMM6qK9CY5wHBzCKrX2xUP0dRTubellage.

Rick Browde Committed Felony Animal Cruelty

Inhumane conditions caused the death of pets taken from the hurricane zones.

July 10, 2021 DISTEMPER OUTBREAK

When the 1st Distemper Outbreak was Reported by HSNT but Reviews on Facebook Yelp & Google Show sick animals were being reported that were sold to the public by HSNT.

Ric Browde is spreading disease into Texas after bringing Lost Pets in from Disasters via the HSUS ASPCA and their partners

The deadly viruses brought into the Humane Society Of North Texas Exposed other pets and resulted in thousands of pets dying and having to be euthanized in Texas.

The distemper outbreak swept through Texas animal Shelters and parks.

Bernard Unti, Kitty Block HSUS, Anna Zorilla LASPCA and Ric Browde Wings of Rescue Caused Outbreaks Nationwide

"https://lh4.googleusercontent.com/ceidIscxOJbttwec-YdmtzWJ9jKIco-pvwmZMtwR2GapVQgtr6Qz25k2Ba8VI7kD15yYWSMoGRILwggA2sNdDHz_kaMPei9CMcdjp2-FO9DiT8AU3QOlfXvJVznFk4YJHpaPWkJeEj977putiQ>"https://lh4.googleusercontent.com/ceidIscxOJbttwec-YdmtzWJ9jKIco-pvwmZMtwR2GapVQgtr6Qz25k2Ba8VI7kD15yYWSMoGRILwggA2sNdDHz_kaMPei9CMcdjp2-FO9DiT8AU3QOlfXvJVznFk4YJHpaPWkJeEj977putiQ>"https://lh4.googleusercontent.com/ceidIscxOJbttwec-YdmtzWJ9jKIco-pvwmZMtwR2GapVQgtr6Qz25k2Ba8VI7kD15yYWSMoGRILwggA2sNdDHz_kaMPei9CMcdjp2-FO9DiT8AU3QOlfXvJVznFk4YJHpaPWkJeEj977putiQ>"https://lh4.googleusercontent.com/ceidIscxOJbttwec-YdmtzWJ9jKIco-pvwmZMtwR2GapVQgtr6Qz25k2Ba8VI7kD15yYWSMoGRILwggA2sNdDHz_kaMPei9CMcdjp2-FO9DiT8AU3QOlfXvJVznFk4YJHpaPWkJeEj977putiQ>"https://linearcontent.com/ceidIscxOJbttwec-pvwmZMtwR2GapVQgtr6Qz25k2Ba8VI7kD15yYWSMoGRILwggA2sNdDHz_kaMPei9CMcdjp2-FO9DiT8AU3QOlfXvJVznFk4YJHpaPWkJeEj977putiQ>"https://linearcontent.com/ceidIscxOJbttwec-pvwmZMtwR2GapVQgtr6Qz25k2Ba8VI7kD15yYWSMoGRILwggA2sNdDHz_kaMPei9CMcdip2-FO9DiT8AU3Qpdfx4AU3Qpdfx

Hurricane Laura

Pets originated from Tim Percivul ASPCA Calcasieu Parish and were released to the LASPCA, turned over to the HSUS and flown out by the Wings Of Rescue. Those pets were carrying the deadly Distemper and Virus which is noted in their records so they knew they were flying pets across state lines carrying CDV.

Many of the pets originated from

Tim Perciful ASPCA and were shipped out by HSUS Shipper Rick Browde Wings of Rescue.

The organizations 2018, 990s show embezzlement in ProPublica.

Who operated Illegally and would not allow people to retrieve their family pets from Calcasieu Parish.

https://lh5.googleusercontent.com/L5-KzsKXSBHxD17WESWd5VKysobkGWNn_-_lwdP299dulQfbZi2QKQYZNQXHS_lbOqOJB9-MWo29ERUQfIHFrrHOsVBTvNvg-IG8ITiyTw0pr5oCnGYla5xUxqqnJjJiSHfx9tiYRSmjzuW7Gw>

2,163 pets were needlessly dumped into the Humane Society Of North Texas from Louisiana.

Nominal amount of money was wired to the Humane Society of North Texas from HSUS.

https://lh5.googleusercontent.com/ZcnvL1bQ05ucf8sNLqXZU5YA2vD4Hn7XpRIAVmqviH7a8Bza_DGUoG17a-9IPHx-5heR8wkfBA5G3G5Cj2Zr0RDUyRDoo3MrAlvRM0-pqqfn-F42J5bSO-ZzgoIt9dkptrQ>

HSNT Data

https://lh5.googleusercontent.com/8XxFqxFRmZyyuKEuAWN3ayo8unJrBb6Q2LNgo7poZuDvX4nAg0_ERKfryxEw6MtxTsqFZUXcHFt1TM0blBKYMgwYdCTqw

HSNT also received additional Animals from the Houston SPCA, pets were shipped from Louisiana to Texas

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<a href="https://lh5.googleusercontent.com/kMdMtMwJe5fHQ-">https://lh5.googleusercontent.com/kMdMtMwJe5fHQ-</a>
qYZrb2xjbH0xoG72aDPq3db244_t1xguWInSAV_qOiycytz6T-
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syK8DPuMVCq>
Shipments came in to the Humane Society Of North Texas from corrupt Nonprofit,
The Humane Society of the United States
(HSUS) after Hurricane Laura.
HSUS coordinated Shipments with the LASPCA and Wings Of Rescue Rick Browde is the
main Shipper for the Corrupt Nonprofits
Records show pets were transferred with Canine infectious respiratory disease
<a href="https://lh4.googleusercontent.com/nHSeKg1EgL1a-">https://lh4.googleusercontent.com/nHSeKg1EgL1a-</a>
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The men behind the biggest scam ever perpetrated on The public that donates to Animals. HSNT has been used as a dumping ground for pets they raised millions of dollars portraying they were saving.

https://lh5.googleusercontent.com/wDjqaHsbdpAcaFHYP4p0SwtaYBDFI3WzBD84r1hmATy0XPdtkVtzhePbgjLw10dTI2mrdHyPm1yE_B50SBUD3uA061lnNIhDW8Bhl1Swoy2JMkVqcO2mSpIq6zCn07db1bhgD19GQ9MUJ

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HSUS shipments that brought the New Strain of Canine Distemper Virus ASIA1

Into the United States

There were several other shipments prior and outbreaks were prevalent after.

https://lh6.googleusercontent.com/wP_4Vhw5l_C_tNRI9MsIB6mYSVdkua5KzrxFZz0uocNaleZoDkvqica0ciyc541Z8ZiVyaHOutl04q PJ0icne1nzngBp2Gqd-iUuTGL9LZXTxYqc4x2k4rPp5FHcyP9Kq>

After hurricanes corrupt Nonprofits HSUS, WOR LASPCA & ASPCA began the Reckless Shipments

Families' pets had not been given a chance to be reunited with families and were lost in the system.

HSUS & partners exploited missing pets from hurricanes as a publicity stunt to raise donations.

It is a felony to ship sick pets across state lines

It is also a violation of HR 3858 to remove pets from their home states without a chance to be reunited with their families.

HSUS was nearly indicted by the Louisiana Attorney General after Hurricane Katrina for the exact same thing!

Pets shown here are transferred with (CIRD) canine infectious respiratory disease likely Canine Distemper and other infectious diseases.

Matt Berkshader
ASPCA

Rick Browde
Wings of Rescue

Bernard Unti
HSUS

Adam Lamb
BVSPCA

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And others.....

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Humane Society Of North Texas
CEO Susan Gulig

Virus Outbreaks after pets are delivered from the HSUS, LASPCA,

Wings Of Rescue with Canine Distemper.

Many of the pets originated from ASPCA Louisiana state animal Response team from the Calcasieu Parish animal shelter

Pets were never given a chance to reunite with their families after Hurricane Laura

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May 26, 2021

HSNT SELLING SICK DOGS MANY STOLEN FROM HURRICANE SURVIVORS

HSNT Reviews repeatedly tell of botched surgeries

HSNT spreading Deadly and Viruses to the public's pets which cost the Public tens of thousands veterinarian bills and spreading disease into the general population of Fort Worth Texas.

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Corrupt Organizations stick together

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Disease Spread to other Texas animal Shelters some have indefinitely shut down others stop all adoptions and begin Euthanizing.

BARC Houston

Humane Society Of North Texas

Dallas animal services

Texas SPCA is closed -Director's have not explained why

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Thousands of pets were dumped into Texas by Rick Browde via the HSUS and ASPCA

Overcrowding and viral outbreaks have destroyed Texas animal shelters' viral health and minimized the chance of adoption for Texas Pets already residing in those Animal Shelters.

Nonprofits are not saving pets lives,

they are causing their deaths.

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- * 2021 CDC BANS IMPORTS OF DOMESTIC PETS
- * RABIES OUTBREAK CAUSED BY ANIMAL

CORRUPT ANIMAL NONPROFIT

- * MULTI-STATE RABIES INVESTIGATION BEGINS
- * EVEN AFTER CDC BAN HSUS DOMESTIC IMPORTS INTO THE USA

Nonprofits pose a biosecurity risk to Poultry Farms

Influenza is spreading to Poultry Farms

and animal species have been found to be affected by a specific strain of avian influenza (Guangdong lineage H5N1

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kskL0FT5SRfRO42aut5CYnI_h0HkSyW9D3i72YuYyTxJba8ni4PekXot6WP5qqsQWBO4Rwc22TtutZpBfYENPkXIzJ-aGg16y4kHog>

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HSUS Was under Criminal investigation after Hurricane Katrina for the same criminal actions they committed after Hurricanes Laura, Ida, Barry and Michael, shipping Disaster Victims Pets out of state. Raising donations on Disaster victims pets they're scattering across the nation and displacing pets even further from home,

Complaints have been Filed with Criminal Investigators in three states. HSUS knew there was an inquiry from the attorney general Office in Louisiana so they were very sneaky during hurricane Ida and operated under Tim Kunan never stepped foot in Louisiana however they raised Donations.

HSUS Operations were suspended during hurricane Laura and and St. Landry Parish they operated again without an MOU As described by Van Reed Director of emergency preparedness HSUS had no business operating in St Landry Parish.

Additionally HSUS Caused Another

DISTEMPER OUTBREAK in St. Landry Parish.

LASPCA HSUS Operated together Shipping Sick Dogs away from their homes from Calcasieu Parish after Hurricane Laura and into

The Humane Society of North Texas

Pets were dumped in the high kill shelter Broward county humane. Newspaper article show mass killings.

https://lh6.googleusercontent.com/OMi8mCmIQyLuGtam6wnsDiKIZX7GmPq2Rl9NyxsA43wYwV24C0pLfW92rLl-GmWi8wGkRSVutMg>

"https://dx.doi.org/10.2016/10.2

">https://lh4.googleusercontent.com/_8g_rClG6B0eXV0bvbmUtw3yocaewQ5OVzOP1ZQDnCf7PwlWwSyMuKpRNWx1Cnb2l4YVC4Bqh]gwCSO8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_8g_rClG6B0eXV0bvbmUtw3yocaewQ5OVzOP1ZQDnCf7PwlWwSyMuKpRNWx1Cnb2l4YVC4Bqh]gwCSO8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_8g_rClG6B0eXV0bvbmUtw3yocaewQ5OVzOP1ZQDnCf7PwlWwSyMuKpRNWx1Cnb2l4YVC4Bqh]gwCSO8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_8g_rClG6B0eXV0bvbmUtw3yocaewQ5OVzOP1ZQDnCf7PwlWwSyMuKpRNWx1Cnb2l4YVC4Bqh]gwCSO8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_gwcSo8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_gwcSo8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_gwcSo8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_gwcSo8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_gwcSo8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_gwcSo8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_gwcSo8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_gwcSo8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqDRvVAhNQPnsJNaBHVf4yVxzbXzUzA>">https://lh4.googleusercontent.com/_gwcSo8FIeHnCV0uJmW0PZ-NueFTD28KWiGNqUzAANQPNABHVf4yVxzbXzUzAANQPNABHVf4yVxzbXzUzAANQPNABHVf4yVxzbXzUzAANQPNABHVf4yVxzbXzUzAANQPNABHVf4yVxzbXzUzAANQPNABHVf4yVxzbXzUzAANQPNABHVf4yVxzbXzUzAANQPNABHVf4yVxzbXzUzAANQPNABHVf4yVxzbXzAANQPNABHVf4yVxzbXzAANQPNABHVf4yVxzbXzAANQPNABHVf4yVxzbXzAANQPNABHVf4yVxz

Susan Gulig is part of the same corrupt crowd that continues to disregard how dangerous shipping thousands of pets across the nation is and how dangerous Distemper is to not only Domestic pets but also Wildlife.

Susan Gulig was partly the cause of the biggest Distemper outbreak in Texas history and where the outbreak began at the Humane Society Of North Texas known for selling sick pets to the public.

Dr. Anderson A local veterinarian speaks of the horrific conditions and adopting a very sick animal from The Nonprofit Humane Society Of North Texas.

In 2019 over 50% of the animals were killed in the Anderson animal shelter Texas

The Anderson County Humane Society euthanized 44 adult dogs due to a distemper outbreak. Up to half of the dogs have already been put down.

https://www.palestineherald.com/news/44-dogs-to-be-put-down-in-distemper-

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.palestineherald.com%2Fnewdogs-to-be-put-down-in-distemper-d

&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e217264

During 2021 it happened again

https://www.indexjournal.com/news/breaking/hsog-treats-3-cases-of-distemper-in-animal-shelter/article_5a044ff1-847d-5e86-afab-a94ad48b9e78.html <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.indexjournal.com%2Fnews%treats-3-cases-of-distemper-in-animal-shelter%2Farticle_5a044ff1-847d-5e86-afab-a94ad48b9e78.html&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff

Canine Distemper Virus Asia 1 is circulating, it is vaccine resistant and it is a human Measles variant.

Mega Adoptions are what the Corrupt Organizations make millions of dollars from.

These pets are being illegally sourced from hurricanes and tornadoes.

PetSmart Customers Pets Likely had Pets

Affected by the Viruses they were spreading into the community and at PetSmart Adoptions of Stolen Pets Sourced in Calcasieu Parish after Hurricane Laura.

DVM Katherine Wilbert

Dana LA Paws, Asia & her Rescue Partner at Compassion Kindness

All CONFIRMED Families looking for their pets were DENIED ENTRY to The calcasieu shelter by Renee Poirrier and Matt Berkshader who claimed the shelter was

"To DAMAGED to ENTER"

This Group of Individuals has operated together since Hurricane Katrina

They also work with Ric Browde and Adam Lamb Who are shipping and selling sick pets.

Excerpts of records show people's pets were shipped out of state after Disasters are

provided in this Document.

The Nonprofit Director Ana Zorilla Redacted Microchips and shipped pets out with by HSUS.

Browde spread Distemper into Animal Shelters across the nation after Hurricane Harvey, Browde ships thousands to Adam Lamb who sells and ships Sick and Dying Pets.

Pets originated from Calcasieu Parish ASPCA . Matt Berkshader told hurricane victims "the shelter was too damaged to enter." The pets were quickly flown out by HSUS Wings Of Rescue after they were turned over to LASPCA.

The same group did the same after Hurricane Harvey at the NRG Arena with 400 dogs with Distemper being Transferred Across the Nation.

The same groups use the same shelters and every year the same outbreaks occur but this time it's worse because the HSUS brought in the Deadly CDV Asian (1) it is vaccine resistant.

The directors of the nonprofits that caused the death of animals are guilty of felony cruelty to animals and Fraud.

We have tracked the viruses to the shelters that continue to Spread Distemper after each hurricane.

The blame is not on the animal shelters that did not receive pets from out of state, but of the shelter directors that did take animals from out of state disasters.

Those Pet Nonprofits Directors in

fact created a whole new disaster in Texas.

https://lh5.googleusercontent.com/W0RGxiyqyzjf2ETuOTJTBjIZhtUdJb4YgmC_8fBUEFBP_mQjpDIR3v136 NIZDayuHORRkpaOJJXdPAyHic9wY01iRyWtV8_CJuUAPCHE060_t4aWx1nrc0KJA>

Mega Adoptions exacerbate the spread of deadly virus outbreaks.

DEATH CAUSED BY NONPROFITS CONTINUES ACROSS THE U.S.

https://lh6.googleusercontent.com/w3fF5DMXM8Ai3FJbg_9TvWzcIHdBX-

n9xJS9NhGl7ivWNHsWeYIsleONLSCNU1mq0CoAHuZJjo7uIS56hltG_3OKgwQSbJ2QsJwW92I8xdx1gSDixGyhyCMmQR1tz3XEAm02NOmf_qE6cylw> <https://lh6.googleusercontent.com/YVHTu3m5gHN1EvqoKcE0pjoCE4uPhcoiQvVQvIIUzTlQzZMIOAVcyQjkE VqB8ybJqGwWOGR2FLrgD1gNA6ngr49Z2M1GoFA>

Additionally Cat Outbreaks in Texas caused the death of dozens of animals.

"https://lh3.googleusercontent.com/ybppgKxUqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSTy0AXr78L-LmKR_FgWkMVK3FzC0DyJaGtUdXGLvz10Jlz4UCvLo8e7l5zywQR5dL34dU_hXpSvsDBxva9ZA>"https://lh3.googleusercontent.com/ybppgKxUqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSTy0AXr78L-LmKR_FgWkMVK3FzC0DyJaGtUdXGLvz10Jlz4UCvLo8e7l5zywQR5dL34dU_hXpSvsDBxva9ZA>"https://lh3.googleusercontent.com/ybppgKxUqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSTy0AXr78L-LmKR_FgWkMVK3FzC0DyJaGtUdXGLvz10Jlz4UCvLo8e7l5zywQR5dL34dU_hXpSvsDBxva9ZA>"https://links.com/ybppgKxUqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSTy0AXr78L-LmKR_FgWkMVK3FzC0DyJaGtUdXGLvz10Jlz4UCvLo8e7l5zywQR5dL34dU_hXpSvsDBxva9ZA>"https://links.com/ybpgkxuqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSTy0AXr78L-LmKR_FgWkMVK3FzC0DyJaGtUdXGLvz10Jlz4UCvLo8e7l5zywQR5dL34dU_hXpSvsDBxva9ZA>"https://links.com/ybpgkxuqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSTy0AXr78L-LmKR_FgWkMVK3FzC0DyJaGtUdXGLvz10Jlz4UCvLo8e7l5zywQR5dL34dU_hXpSvsDBxva9ZA>"https://links.com/ybpgkxuqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSyva9ZA>"https://links.com/ybpgkxuqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSyva9ZA>"https://links.com/ybpgkxuqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSyva9ZA>"https://links.com/ybpgkxuqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSyva9ZA>"https://links.com/ybpgkxuqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSyva9ZA>"https://links.com/ybpgkxuqRxuQWRhHUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hSyva9ZA>"https://links.com/ybpgkxuqRxuQWRhUSMblZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1vbD8hZBbCBu1tdCDmh-RK8xL0JVfEOQ5nVagEYf1v

https://www.statesman.com/story/news/local/2019/06/04/virus-kills-44-kittens-9-cats-adoptions-suspended-at-san-marcos-shelter/4989783007/
<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.statesman.com%2Fstory%2kills-44-kittens-9-cats-adoptions-suspended-at-san-marcos-shelter%2F4989783007%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908d

Seattle Humane 300 pets from Texas animal shelters.

Virus Outbreaks continue throughout Washington state Many of which are zoonotic.

https://www.q13 fox.com/news/seattle-humane-plans-to-take-in-300-pets-from-texas-animal-shelters

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.q13fox.com%2Fnews%2Fsehumane-plans-to-take-in-300-pets-from-texas-animal-

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On Mon, May 23, 2022 at 6:57 PM Executive Producer VR Films <vr360ent@gmail.com <mailto:vr360ent@gmail.com> > wrote:

Can you Google the sheer number of Shipments into Washington via Wings of Rescue HSUS and other corrupt nonprofits

Google HSUS pets arrive from China Korea

We have reports from the entire country RickBrowde and Kitty Block that's caused deadly virus outbreaks killing thousands of Domestic pets and Wildlife

https://lh3.googleusercontent.com/iBrhthcHhyLVVZHOrAVByLyglxrxU1PGW_6HD8PvwUcmhjcZ0AhV6iC80

https://www.q13 fox.com/news/seattle-humane-has-urgent-need-for-foster-parents-following-large-transfer-of-dogs

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.q13fox.com%2Fnews%2Fsehumane-has-urgent-need-for-foster-parents-following-large-transfer-of-

dogs&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e21

October 29, 2020 Wings Of Rescue greater good continued to fly dogs and cats in Washington during the pandemic and even after viral outbreaks resulted in dogs and cats euthanized.

Wings Of Rescue flew pets from the Humane Society Of North Texas a shelter they caused the deadliest distemper outbreak in after shipping pets with canine infectious respiratory disease from Louisiana into Texas the virus outbreak spread causing the death of insurmountable Numbers of disaster victims lost pets and pets that were already residing inside the shelter at Seattle Humane.

https://www.fox46.com/news/wings-of-rescue-flight-transports-rescue-animals-from-texas-to-seattle/

< https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.fox46.com%2Fnews%2Fwinof-rescue-flight-transports-rescue-animals-from-texas-to-

seattle%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11

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CK1fikN4YzclLXaPFGH9qHqw0Xd8sLv DTCITIjjZ6-bYqcAj34wMjn8ZflfjjyrnacA>

Seattle Humane not living up to promises made in \$30 million campaign for new complex – The Seattle Times

https://www.seattletimes.com/seattle-news/times-watchdog/seattle-humane-not-living-up-to-promises-made-in-30-million-campaign-for-new-complex/
<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.seattletimes.com%2Fseattle news%2Ftimes-watchdog%2Fseattle-humane-not-living-up-to-promises-made-in-30-million-campaign-for-new-complex%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C1

https://www.q13fox.com/news/seattle-humane-plans-to-take-in-300-pets-fromtexas-animal-shelters https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.q13fox.com%2Fnews%2Fse humane-plans-to-take-in-300-pets-from-texas-animalshelters&data=05%7C01%7Cwsboh%40sboh.wa.gov%7Cd054a570a8664d3e94f908da3d181ff2%7C11d0e https://lh3.googleusercontent.com/Hff8JyS4T6kpfo5l8raM6bAGohszqdJP09AftKYjSeVrx8_jyGS5R7x8H3Br EPo07rfwFZypqCtX7GFVjocKLd64e8nItpg0IkNCRaelJL_95ePMK7sHg> https://lh6.googleusercontent.com/hAnCAuiPVCenjhXyhxSELTvYSQ- B50NlEaC59JwnEZw17fO6l3HB7RwJjqMlK9DPhT5Sof9hKpnkWEPnK_9xwm4Y8hPOHd1IAH4Yx8krvXoyvf88H https://lh4.googleusercontent.com/n74r0zSEISaB1f5gHI6FfY24pFHsuHrEB9Lognt2rTBuUZceLwL4jqt4Jczg yn-qKsen63raOnpDZcQ-DzyypEY8gwQfneLJxiDxZ5xo9Nz2B6f5iBzDVOi4VWckXJsZUAoaKNqIZA> https://lh5.googleusercontent.com/3nQm7CsOYOMu0pORvHwUBD7hCwOvb17AvtqAWcMkoKu3G3tVoAcQ RCG5cc9FbamzSgakgh8W8Jdu78-K 45K4YSAydT7uaBIJbzmXOphKs2XDxg> https://lh4.googleusercontent.com/rGe8cooxnXId_2Jzx72Ce8WmjjeTdAmohRApV9pvxpVYwTwN7oo9f2xG https://lh6.googleusercontent.com/4h38abBjEIkrafsZslV5NpJBgGNRlmzfdbuT136ge4p0WpiRLOsmBggMO: https://lh5.googleusercontent.com/p0jTLzuAZqGNW4VspveixWi33VOJQQYW2jj4wQ7V7Aq1T- 2gGBHQC53HU ZWvVnl2bZL40XdQg6xB1cRQUs3J2ZyUTD0s9XSUzr3nchRX0MBzkKm3W84lklnt8mgx2bP R https://lh5.googleusercontent.com/je04oyHPXhSz2889Ch7N27X9pf08D4iQu_cPzel8DPInEBtzEl40b3sZR5k wxBpOq5Rb7fp68vdRxA9Y_NapoGaysH_oONaOSXwaSMl8Vi6PxMWMYOYEy2dNeBEa56xgDNEwP32yA>

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VR360 MEDIA Los Angeles CA.

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VR360 MEDIA Los Angeles CA. ______

From: Kim E Merrick

Sent: 4/26/2022 6:20:17 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Comment from livestock owner

External Email

Hello State Board of Health;

I keep 2 mules on a small property in Jefferson county. I am a member of Back Country Horsemen of Washington (BCHW), and I have attended two 'Horses for Clean Water' classes to learn the proper way to manage my mules. This 'Keeping of Animals' proposal is an issue that could really impact horse owners all over the state, especially small farms.

I don't think there was enough collaboration with stakeholders for this policy change. Different jurisdictions will treat this very differently, depending on the understanding of livestock diet and best practices of managing manure. If the Health department in Yakima County and the health department in King County enforce the rules differently, it will greatly impact who is keeping their horses where. I would say that King county has more and better managed equestrian trails than Yakima County, but there is a greater chance their health dept. officials will have less experience with livestock, thus reducing the horse population in King County.

It's clear to me that this proposed policy has a long way to go before it will be fair and relevant to the livestock lovers of Washington State.

Responsible livestock owners WANT to be good neighbors.

Please delay the draft policy proposal until some kind of task force with STAKEHOLDERS can be formed to address these issues

Thank you, Kim Merrick Sequim, WA 253-262-6188 From: Executive Producer VR Films

Sent: 5/23/2022 4:57:37 PM

To: DOH WSBOH

Cc:

Subject: ZOONOTIC DISEASE-& Ric Browde Kitty Block



attachments\1DB3ABBA0A644694_IMG_4950.jpeg

External Email

Can you Google the sheer number of Shipments into Washington via Wings of Rescue HSUS and other corrupt nonprofits

Google Wings Of Rescue HSUS shipments Seattle Humane Hurricane pets

Google HSUS pets arrive from China Korea

We have reports from the entire country RickBrowde and Kitty Block that's caused deadly virus outbreaks killing thousands of Domestic pets and Wildlife

https://lh3.googleusercontent.com/iBrhthcHhyLVVZHOrAVByLyglxrxU1PGW_6HD8PvwUcmhjcZ0AhV6iC80

https://www.q13fox.com/news/seattle-humane-has-urgent-need-for-foster-parents-following-large-transfer-of-dogs

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.q13fox.com%2Fnews%2Fsehumane-has-urgent-need-for-foster-parents-following-large-transfer-of-

dogs&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3978e60b0618441e3eea08da3d17f8c4%7C11d0e21

October 29, 2020 Wings Of Rescue greater good continued to fly dogs and cats in Washington during the pandemic and even after viral outbreaks resulted in dogs and cats euthanized.

Wings Of Rescue flew pets from the Humane Society Of North Texas a shelter they caused the deadliest distemper outbreak in after shipping pets with canine infectious respiratory disease from Louisiana into Texas the virus outbreak spread causing the death of insurmountable Numbers of disaster victims lost pets and pets that were already residing inside the shelter at Seattle Humane.

https://www.fox46.com/news/wings-of-rescue-flight-transports-rescue-animals-from-texas-to-seattle/

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.fox46.com%2Fnews%2Fwin

of-rescue-flight-transports-rescue-animals-from-texas-to-seattle%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C3978e60b0618441e3eea08da3d17f8c4%7C11

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Seattle Humane not living up to promises made in \$30 million campaign for new complex – The Seattle Times

https://www.seattletimes.com/seattle-news/times-watchdog/seattle-humane-not-living-up-to-promises-made-in-30-million-campaign-for-new-complex/

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.seattletimes.com%2Fseattlenews%2Ftimes-watchdog%2Fseattle-humane-not-living-up-to-promises-made-in-30-million-campaign-for-new-">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.seattletimes.com%2Fseattlenews%2Ftimes-watchdog%2Fseattle-humane-not-living-up-to-promises-made-in-30-million-campaign-for-new-">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.seattletimes.com%2Fseattlenews%2Ftimes-watchdog%2Fseattle-humane-not-living-up-to-promises-made-in-30-million-campaign-for-new-">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.seattletimes.com%2Fseattle-humane-not-living-up-to-promises-made-in-30-million-campaign-for-new-">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.seattletimes.com%2Fseattle-humane-not-living-up-to-promises-made-in-30-million-campaign-for-new-">https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.seattletimes.com%2Fseattle-humane-not-living-up-to-promises-made-in-30-million-campaign-for-new-">https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://g

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VR360 MEDIA Los Angeles CA.

From: Melody Meyer

Sent: 4/30/2022 8:56:44 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal waste policy comment

External Email

Please delay creating a policy without agricultural and livestock owner committee creation.

Please do not implement any new wording without a sustained period of time and committee input from agricultural and livestock people.

Please be sure that the there is a differential between livestock and domestic pets being cats and dogs versus cattle horses goats etc.

I am a horse owner, I compost my manure I turn it into great high quality organic soil, and I use it in my gardens. Every single year. This would substantially affect my operations and my gardening. Though I am not a commercial gardener I depend on the ability to utilize my manure this way. I make sure that it does not have any impact on groundwater. I make sure that it is kept separate and stored responsibly. I also fertilize my fields with it. The immense cost that this could bring to domestic livestock owners would be crippling.

If the department of health is going to create a law about disposal, I would ask that they absolutely create a low cost and effective disposal system as well for horse and cattle owners. If a system is not created and we are forced to dispose of manure through the landfill system or other currently available disposal systems the cost would effectively force us to lose our animals. This is an undue burden on the citizens and it is unfair. Please consider all of these points carefully.

Please delay this bill and allow for further discussion and committee work for at least one year.

Thank you, Melody Meyer 253 961 8840 _____

From: Kay MacCready

Sent: 4/26/2022 3:13:16 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Draft on keeping lifestock

External Email

Please delay the proposal until further clarification of concerns. I'm a concerned livestock owner.

Kay MacCready

From: Glasoe, Stuart D (SBOH) Sent: 6/1/2022 12:18:43 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: FW: Keeping of Animals Language

Stuart Glasoe

SBOH Health Policy Advisor

360-236-4111

From: Dan Wood <dan@wastatedairy.com> Sent: Wednesday, June 1, 2022 11:07 AM

To: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>

Cc: Dan Wood <dan@wastatedairy.com>; Jack Field <jack@wafeeders.org>; Jay

<jay@wastatedairy.com>

Subject: Keeping of Animals Language

External Email

Thank you for the time today.

In general, we do not believe new rules are needed with regard to commercial livestock because they are already regulated by the Dairy Nutrient Management Act, CAFO permits, air emission programs, etc.

However, if the Board of Health is going to adopt regulations, it is important to recognize what a "more stringent standard" means, as proposed in Section 3 of the proposed rules on Keeping of Animals. Absent clarity, there will likely be lawsuits and confusion as to implementation at the local and state level.

I would suggest adding a sentence to Section 3 so that it reads as follows:

3) Unless a standard is superseded by a more stringent standard in federal, state, or municipal law, a person must meet the following standards in order to help prevent, control, and abate nuisance and health hazards related to the disposal of domestic animal waste. Examples of a "more stringent standard" include, but are not limited to, the state Dairy Nutrient Management Act, state or federal CAFO permits issued by Department of Ecology, and fugitive dust or air emission plans approved by Department of Ecology or a local government agency.

This should clarify authorities and avoid confusion and lawsuits.

Again, we do not believe new rules are needed. But, if rules ARE adopted, we want them to be clear and recognize existing programs.

Please include this communication in the documents provided to the Board of Health.

Thank you,

Dan Wood

Executive Director

Washington State Dairy Federation

360-482-3485 (office)

360-870-6018 (mobile)

Dan@WaStateDairy.com <mailto:Dan@WaStateDairy.com>

Call me any time - early, late, weekends, evenings. Really, it's OK. □□

From: Tim Price

Sent: 5/28/2022 7:34:22 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal waist regulation

External Email

To whom it may concern,
I oppose this rule the BOH is looking to implement.
This is one more infringement on our freedoms.
It is written for city dwellers.

It is totally unrealistic to enforce.

How we've survived 200 years as a nation is beyond me. When you have to worry about my cattle's shit, you've got too much time on your hands. Or, you have a specific agenda against some one you personally live next to.

I suggest you move some place else.

Thank you,

Tim Price

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https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Faka.ms%2Fo0ukef&data=05%7C%

From: outlook B842272502ABB902@outlook.com

Sent: 5/12/2022 11:43:47 AM

To: DOH WSBOH

Cc:

Subject: Communicating With Board Members

External Email

To the Washington State Board of Health, I am writing to you to ask that you do not make the COVID vaccine a mandate in order for children to attend public school and here is why: The vaccine has only been approved for emergency use only at this point. There are no long-term studies on the side effects of the vaccine and we don't know what kind of harm it could cause our children in the future. We know that there is a risk for teens and young adults to get myocarditis and pericarditis from the vaccine. Kids are not dying from COVID. The vaccine does not stop the spread of COVID nor does it prevent someone from getting COVID. This is not a vaccine like the Measles, Mumps, Polio, Chicken Pox and it shouldn't be required just like the flu shot is not required. This should be a parent decision on whether or not a child should take have the vaccine. There has already been about 40K children removed from public schools within the last year, if you make the vaccine a requirement you are going to see thousands more. Thank you for taking the time to hear my concerns and the concerns of many other Washington parents.

From: Bahr, Gary (AGR)
Sent: 5/2/2022 3:32:20 PM To: DOH WSBOH Proposed Animal Waste Rule
Cc:
Subject: WSDA comments for Proposed Rule, WAC 246-203-130, Keeping of Animals
attachments\EEE17EE1839F4C22_WSDA Comment Letter for Board of_PRDTOOL_NAMETOOLONG.pdf
Hello,
I respectfully submit the attached comment letter from the Washington State Department of Agriculture related to Proposed Rule, for WAC 246-203-130, Keeping of Animals. Thank you for the opportunity to provide comment.
Thanks,
Gary
Gary Bahr
Science Liaison
Office of Director
Washington State Department of Agriculture
Olympia, Washington
c-360-349-0522
gbahr@agr.wa.gov <mailto:gbahr@agr.wa.gov></mailto:gbahr@agr.wa.gov>



May 2, 2022

Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

Dear Board of Health:

One behalf of Washington State Department of Agriculture, I am writing to provide our comments related to the Proposed Rule for WAC 246-203-130, Keeping of Animals. The proposed action would include a title change to Domestic Animal Waste, and propose new standards for the handling and disposal of animal excreta, or animal waste, for the purpose of preventing and controlling nuisance and health hazards. While we agree that these various issues are of potential concern, we would like to express concerns about a new layer of regulatory actions and responsibility related to authorities and duties of other agencies, while potentially not utilizing existing efforts and opportunities for success through educational and voluntary methods.

The Washington State Department of Agriculture (WSDA) is the agency with responsibility over Dairy Nutrient Management (Chapter 90.64 RCW) and rules. The Dairy Nutrient Management laws and rules require dairy animal feeding operations to have dairy nutrient management plans created and approved. The WSDA Dairy Nutrient Management Program (DNMP) staff and Conservation District partners conduct the work to ensure plans are properly implemented, while conducting inspections, education, and technical support. Other partners such as Washington State University researchers and extension staff assist with research, education, technical support, and specialized training. The DNMP staff also conduct specialized water quality monitoring in certain locations where there is increased precipitation and also where facilities are in close proximity to surface water that may lead to impacts to vulnerable aquatic systems and shellfish production locations. The DMNP efforts are an example of how concentrated animal agricultural systems are successfully regulated for the protection of water quality and human health. Part of the success is that the Washington State dairy industry is highly cooperative and supportive of efficient regulation. Every milk producing dairy farm is registered and also regulated for other aspects of operations such as milk production, milk quality and food safety.

When considering how to protect water quality and human health from other diverse animal manure sources around the state, these same kinds of regulatory approaches would be very difficult to apply to many thousands of small animal waste sources. Diverse and complex

nonpoint source pollution is most commonly handled through the implementation of the Washington State Nonpoint Source Plan and associated pollution abatement structures, programs and systems of voluntary approaches. Our agency believes that working with the thousands and thousands of landowners on animal waste management would be more efficient and effective if the efforts were voluntary and supported by state and local coordination, funding of preventative programs, and education and technical assistance. The Washington State agency system of working with nonpoint source and smaller animal systems are structured around voluntary approaches to protect water quality. The attempt for Board of Health to regulate landowners that own and manage small numbers of animals would be contrary to the existing systems and would be confusing and very onerous for the Board of Health and the associated agency partners. Landowners often look to the Washington State Conservation Commission (WSCC), Conservation Districts (CDs), USDA Natural Resources Conservation Service (NRCS), Washington State University (WSU), Ecology, and WSDA for assistance, cost share programs, and technical assistance. A sudden regulatory effort would be very difficult to implement and would all of sudden affect the opportunity for the thousands of property owners to work with the voluntary processes and programs. There are currently many examples of CDs and other partners successfully working with landowners on manure management. We encourage the Board of Health and the Department of Health (DOH) to work within the existing Washington State Nonpoint Source Plan and strategies for achieving federal and state goals for managing animal waste and protecting water quality and human health.

The tasks of managing general small farm manure sources for the protection of water quality and human health can be best taken care of through voluntary and educational processes. We suggest that the Board of Health and DOH review the successful efforts in the state and look for opportunities to collaborate with other state and local agencies to focus on effective and efficient processes in a cooperative process. A combination of education, outreach, and technical assistance efforts would provide for an effective process, combined with existing DOH Office of Drinking Source Water Assessment planning, capture zone and time of travel analysis, and contaminant inventories for all Group A and B public drinking water systems. Instead of attempting to regulate many thousands of landowners with small animal systems, it would be more prudent to pursue a coordinated effort for voluntary efforts while providing education, technical assistance and local support. Our agency has extensive experience with animal agriculture regulation and management. We know there are many manure management issues to tackle and we would like to highlight some of the existing state and local voluntary processes and successes that exist in our state and other locations in the country. We look to highlight how the main state and local groups are working on this, and provide some suggestions for what is working and potentially how Washington State DOH and ODW can join the efforts that would be complimentary. Our agency suggests that we collectively strive to provide tools for land owners and farmers to recognize their own resource concerns and become engaged in their on farm solutions whether they produce their own food, supply food to local markets, or own hobby farm, working, or recreational animals.

We provide this list and summarization of the overall state processes combined with a few examples of state and local groups are working on the manure management topic. Some of these

efforts could be a future focus of partnerships and efforts that could be complimentary and assist in providing solutions.

- There is the broader Ecology Clean Water Act Nonpoint Source Plan approach in Washington State, where the Washington State approach to abating nonpoint sources of pollution are outline. The state's nonpoint source plan provides descriptions of roles and responsibilities, and regulatory and voluntary approaches. The WSDA DNMP effort is described in the plan and other voluntary approaches for smaller potential pollution sources are described outlining management through voluntary, educational and technical approaches.
 - The overall Washington State NPS Plan https://apps.ecology.wa.gov/publications/documents/1510015.pdf
- The nonpoint source agricultural pollutant sources come under the purview and jurisdiction of a number of state and local agencies under the state Clean Water Act Washington State Nonpoint Source Plan and associated programs.
- Ecology is leading the Voluntary Clean Water Guidance for Ag Effectiveness Workgroup and producing Best Management Practice (BMP) guides and manuals including materials geared toward small farms, heaving use areas, grazing, nutrient management, irrigation water management, and manure management. WSDA, WSCC, WSU, EPA, USDA NRCS, Conservation Districts, and other public and private sector groups are teaming together to support Ecology in this Voluntary Clean Water Guidance for Ag Effectiveness Workgroup. We encourage the Board of Health and DOH, or a designated group such as the Office of Drinking Water (ODW), to reach out to Ecology staff to join the group and contribute the ongoing efforts to produce guides for agricultural nonpoint groups and provide for prevention approaches. The collective group is active with producing science-based products and then working to find implementation and funding opportunities to engage local landowners to prevent pollution. All the combined groups are engaged and working toward effective and efficient government processes to collectively tackle these issues. We encourage DOH and the ODW to join and support these approaches.
- There is an ongoing approach with Ecology and the nonpoint source team for developing a new Agricultural BMP guidance. Ecology has been leading meetings for several years of the Voluntary Clean Water Guidance for Ag Effectiveness Workgroup. WSDA and numerous others agencies and groups are a part of this workgroup supporting Ecology in developing the agricultural BMPs.
- This rule making seems contrary to the current approaches developed through the
 Ecology meetings of the Voluntary Clean Water Guidance for Ag Effectiveness
 Workgroup https://ecology.wa.gov/About-us/Accountability-transparency/Partnerships-committees/Voluntary-Clean-Water-Guidance-for-Agriculture-Adv, to implement the
 Washington State NPS Plan.
- There are many resources and examples of work being done in Washington State and around the nation and we encourage the support those efforts for voluntary solutions prior to moving to some regulation that could be wasteful. How would an agency actually regulated many thousands of small farms?

- We encourage an approach where successful current and cooperative efforts are inventoried and assessed, and then additional funding is sought for improving voluntary systems.
- The WSDA Natural Resources Assessment Section (NRAS) and DOH ODW team is already working on pilot efforts for ground water protection in source water areas where agriculture is the primary land use.
- The DOH ODW is working to fund new and updated Source Water delineation modeling in the Yakima Ground Water Management Area (GWMA) to assist in focusing on the GWMA implementation in delineated capture zones. The Yakima GWMA Plan is located here: https://www.yakimacounty.us/541/Groundwater-Management.
- Completing capture zone, time of travel, and contaminant source inventory work in the Yakima GWMA and statewide would be an important step for aquifer and drinking water protection. Source water assessments can be combined with other GIS based mapping tools and modeling to assist in focusing precious state and local resources for making protection improvements in source water areas.
- Small farm and landowner management of nonpoint source pollution should be voluntary and prevention efforts is supported by state and local efforts and supported from other partners such as the USDA NRCS.
- Prevention of contamination of surface water, ground water, and public and private drinking water systems is best accomplished with voluntary education and training programs.
- There are many national, regional, state and local organizations that have worked on the topic of animal waste and manure management with small farms and rural landowners.
- There are many resources as well as funding sources available to implement programs that can be targeted to the appropriate audience and stakeholders.
- In Washington there are many groups that have been working on these strategies and education and prevention programs including the WSCC, CDs, WSU, NRCS, WSDA and others.
- The management of small farm and rural potential contaminants such as nutrients, sediment, pathogens, and other nonpoint source pollutants is best handling through non regulatory and educational and prevention programs.
- While DOH has authority to create and focus rules on certain potential contaminants to
 protect human health and drinking water systems; we recommend that the agency
 consider assessing the potential power and success of state, federal and local government
 partnerships; along with agriculture associations and groups to tackle this issue in a more
 focus and preventative manner.
- Creating new rules that would have a broad and comprehensive approach to the whole state would be difficult to implement and enforce when there are many thousands of potential private property owners around the state that would become newly regulated. There would be many impacts to DOH staff and associated state and local governmental partners with a difficult and potentially contentious rulemaking such as this. This type of rule and the potential implementation would actually be counterproductive to the already active and challenging task of implementing educational and voluntary measures with landowners.
- Our view is that the current approaches of education, technical assistance, and voluntary efforts is currently building and gaining momentum with the Ecology Voluntary Clean

Water Guidance for Ag Effectiveness Workgroup Team and various agency efforts. Some key partners working to create partnerships and successful programs are the WSCC and CD efforts, NRCS cost share and farm planning efforts, and the WSCC Voluntary Stewardship Program (VSP) https://www.scc.wa.gov/vsp. There are a number of key ground water protection program efforts around the state including the: Yakima GWMA, Grant County SDWA project with WSDA and DOH, and the Ground Water Protection Program efforts in Whatcom Country with the CD, Ecology and WSDA. In addition, the unique interagency and international effort with the Nooksack Fraser Transboundary Nitrogen (NTF-N) project is a very important cooperative effort supporting sound science and solutions for nitrogen issues in the Nooksack watershed. These are just a few examples of ongoing successful efforts that are gaining momentum.

- There are many ongoing programs, efforts, and technical tools available for manure and small farm animal waste management such as:
 - o https://lpelc.org/manure-management-on-small-farms/
 - o https://lpelc.org/manure-management-on-small-farms/#.VOtCiEJEjDM
 - o https://www.rd.usda.gov/programs-services/water-environmental-programs/solid-waste-management-grants/wa
 - o https://www.usda.gov/topics/farming/resources-small-and-mid-sized-farmers
 - https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/nra/rca/?cid=nrcs143_014211
 - https://www.nrcs.usda.gov/wps/portal/nrcs/main/?ss=16&navtype=SubNavigation &cid=null&navid=150180110000000&pnavid=150180000000000&position=Sub Navigation&ttype=main&pname=Manure%20&%20Nutrient%20Management% 20%257C%20NRCS
 - o https://connect.extension.org/event/equipment-and-facilities-for-managing-manure-on-small-farms
 - o https://bentonswcd.org/mud-and-manure/
 - o http://whatcom.wsu.edu/ag/nutrient/guidel 1.pdf
 - o https://puyallup.wsu.edu/soils/manure/
 - https://extension.oregonstate.edu/collection/mud-manure-management-resources-small-farms
 - https://nerc.org/documents/manure_management/guide_to_providing_manure_management_ed.pdf
 - https://www.extension.iastate.edu/smallfarms/manure-management-acreages-and-small-farms
 - o https://www.scc.wa.gov/vsp
 - Michigan Agriculture Environmental Assurance Program, https://maeap.org/
 - https://www.nrcs.usda.gov/wps/portal/nrcs/detail/vt/technical/dma/?cid=nrcs142p 2 010561
 - o https://aces.nmsu.edu/farmasyst/
 - o https://bookstore.ksre.ksu.edu/pubs/homeasst.pdf
 - https://extension.psu.edu/programs/nutrient-management/related-programs/pennsylvania-farm-a-syst
 - o https://www.landcan.org/
 - o https://www.epa.gov/sourcewaterprotection/assess-plan-and-protect-source-water
 - o https://www.epa.gov/sourcewaterprotection/source-water-assessments

- https://ecology.wa.gov/About-us/Accountability-transparency/Partnershipscommittees/Voluntary-Clean-Water-Guidance-for-Agriculture-Adv
- We recommend that the Board of Health place more effort, resources, funding, and
 partnership effort into further developing the SDWA and DOH ODW programs
 https://www.epa.gov/sourcewaterprotection/assess-plan-and-protect-source-water for
 Group A and B source water modeling and system delineations and capture zone and
 time of travel analysis updates to properly assess the source areas for each public
 systems.
- This process in Washington State is very incomplete and the protection of ground water, source water, and public drinking water systems would be great enhanced if DOH, Ecology, WSDA, WSCC, CDs, and NRCS actually knew what spatial land areas up gradient of drinking water systems to focus on for our collective and current FTE staff time, resources, and funding.
- Our WSDA NRAS team is currently fulling engaged with DOH ODW staff in assessing all the Group A and B public drinking water data for nitrate, pesticides, and any other potential contaminant of concern.
- Our team has been very successful in proactively reviewing all the data, prioritizing what
 areas could be assessed and worked on in a systematic process. The goal has been to
 conduct a few focused projects such as the Yakima GWMA Implementation and Grant
 County ground water project to conduct update capture zone analysis and provide for
 programs to educate and provide technical assistance for nonpoint pollution issues that
 are voluntary in nature.
- These efforts should be pursued prior to some broad scope regulatory approach that would pull all the state and local agencies into something that would be misguided and result in wasting resources, funding, and antagonizing local land owners and small farm owners. It is our view, through first hand experiences, that small farm owners will make improvements once they're engaged with their local technical service provide through VSP and other programs which are lead with the CD, WSU Extension, WSDA and local watershed groups.

We appreciate the opportunity to comment on this draft rule making. We recommend that the state and local partners work to combine efforts and develop strategies that will incorporate effective and efficient use of staff, resources, and technical expertise. Our collective efforts should be strategically focused to work with agriculture and local landowners for farm system management, resiliency, and human health and environmental protection. We respectfully request that this proposed rule not be pursued. We look forward to working with the Board of Health to provide any additional input and helpful comments.

Thank you for considering our input, and we look forward to hearing back from you.

Respectfully,

Day Bahr

Gary Bahr

Washington State Department of Agriculture, comments for Board of Health Proposed Rule, WAC 246-203-130, Keeping of Animals, May 2, 2022

Science Liaison
Office of the Director
Washington State Department of Agriculture
Olympia, Washington
Contact information: 360-349-0522, Gary.Bahr@agr.wa.gov

PC: Kelly McLain, Policy Advisor, WSDA
Evan Sheffels, Senior Policy Advisor, WSDA
Robin Schoen-Nessa, WSDA
Perry Beale, WSDA
Vince McGowan, Ecology
Sage Park, Ecology
Holly Myers, DOH ODW

From: a777dude@aol.com Sent: 4/27/2022 10:28:22 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Keeping of Animals

External Email

Quit playing games!

Delay action on this proposed rule and create a work group with key stakeholders

From: Lori Gese

Sent: 4/27/2022 6:45:05 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Please postpone

External Email

Good morning, the new legislation being proposed about livestock waste is very concerning and confusing.

Please postpone the draft proposal from June's hearing. It seems that it would be most helpful to allow a work group/task force of stakeholders to convene and sort out the concerns. I don't think you realize the huge negative impact that the current proposal will have on so many small private homes who have livestock. Thank you for your consideration.

Respectfully, Lori Gese

Sent from my iPhone

From: richardmforde@aol.com

Sent: 4/14/2022 12:45:25 PM

To: DOH WSBOH

Cc:

Subject: Safe and Effective

External Email

To the Board:

The recent Pfizer data dump proves that the "safe and effective" mantra is a lie. As you may know, or may have ignored, there was an attempt to hide the Pfizer trial data for 75 years, but a court order recently released it, and the reports illustrate the deception and disconnect with real world data.

It has been known all along that the shots were not safe and effective. It does not help public trust to continue the lie.

Regards,

Deanna Burlingame Eatonville _____

From: Susan Sterling-Williams Sent: 4/28/2022 7:39:32 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal Waste Rule

External Email

Please delay the proposal ruling in June and provide the opportunity to reassess the waste removal regulation in the state.

Urban settings should be different than rural settings.

Excessive waste could pose a health problem to urban neighbors. That is what should be regulated....excessive waste not being properly composted and regulated & moved for use elsewhere on private properties.

Susan Sterling-Williams...Snohomish County (Machias Foothills)

From: Richartz, Saundra Sent: 4/29/2022 3:50:08 PM

To: DOH WSBOH Proposed Animal Waste Rule Subject: Keeping of Animals rule comment



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External Email

Please accept the attached as a comment from members of the Senate Republican Caucus.

Saundra D. Richartz

Staff Counsel

Washington State Senate Republican Caucus

Phone: (360) 786-7943, Fax: (360) 786-7815, Cell: (509)690-7648

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F 1 191 11 1

From: Judith Hoyle

Sent: 4/26/2022 10:44:25 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Comments on SBOH Keeping of Animals rules

External Email

Having read the proposed document, I, too, have many concerns about it.

I join with other livestock and "pet" owners in the request that you postpone the draft proposal from the June meeting so that more evaluation can be done, more clarity provided, and that a work group/task force of stakeholders be conveyed to sort out the many, many concerns this document raises.

There are concerns regarding mixing management of livestock with non-livestock rules, unclear and overreaching rules regarding stockpiling and composting, extreme concern about complaint abuse from neighbors - especially urban or the dreaded "I recently moved to the country from the city and I can't stand the noise/smells/flies" type of neighbors who move into a new situation in the "country" and want it to be just as "clean" and "pristine" as a city might be. There is also no uniformity of enforcement, as it appears to be left completely to the local health officer.

So much is simply not thought through in this draft document.

Thank you for your consideration.

Judith Hoyle 1912 West Valley Rd. Chimacum, WA 98325 From: DonYeta Villavaso Madden Sent: 6/1/2022 6:06:58 PM

To: DOH WSBOH

Cc:

Subject: My Public Comments

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External Email

Good evening,

I would like to sign up for public comments for the June 8 meeting and have them shared with the Executive Director. In reviewing the priority areas for WA State Department of Health Executive Report, I am concerned that there is more concern and attention on what to do with animals than people on the agenda and the 2022 report is silent on a few key priority areas. I understand animals may be a sanitary or environmental issue – however, we've not solved for access to mental health or substance use services. If we treated animals like vulnerable eresidents, the state would be outraged.

My experience with trying to navigate department of health to gain access for Medicaid dual coverage form my adult son who has Medicare has been and is unnecessarily challenging – when this is an option for people. Enough information or trained employees are aware on how to access this benefit for those persons with disability receiving Medicare. There is a decline in service provider for critical services for addiction and mental health services, which is forcing an increased cost to taxpayers by only stabilizing people that otherwise require longer-term services. Places like Tele-care are ineffective as an option since the goal is to churn people out after a few days. Mental health meds take longer to be properly evaluated.

Providers are not up-to-date on state laws related to involuntary commitment or Ricky's law and how to exercise them. Facilities are turning away people in crisis only to have them return three to four more time. We need to do better. This is a public health crisis

that should be provided the same urgency as COVID. The racial demographics of population consistently harmed by such practices continue to show overrepresentation of BIPOC individuals receiving less and less of an already strained system and fundamentally, this seems to be an area that should be a priority for this year and coming years until an adaptive strategy is identified beyond technical fixes.

I am also concerned about the fragmented government systems that could work better with shared taxpayer resources to provide more culturally responsive care and address gaps that lead to more public health issues – specifically mental health issues. What is Department of Health doing to stand in the gap and priorities the needs of the most vulnerable residents of WA?

Have patience with all things, but first with yourself." - St. Francis de Sales

DonYeta "Yee" Villavaso-Madden Principal Consultant & Founder

Lucy Yee Management Consulting

(253) 867 - 4YEE (4933) <tel:(253)%20867%20-%204YEE%20(4933)>

(206) 966- 7477 <tel:(206)%20966-%207477>

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Donyetavm@lucyyeemc.com <mailto:Donyetavm@lucyyeemc.com>

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From: James Thompson Sent: 4/29/2022 2:28:04 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: CR-102 Keeping of Animals Comment

External Email

Concerned,

I am a Washington Resident and Homeowner. I keep my horses and livestock on my acreage, south of Oak Harbor, WA. I learned of proposed rulemaking CR-102 through the Backcountry Horsemen of Washington (BCHW) of which I am a member. I know you have met with and been in communication with both BCHW and many other concerned organizations.

This rulemaking provides a somewhat vague definition and mixes non-livestock and livestock rules which can have unintended consequences. I agree with the concerns of BCHW such as mixing livestock oversight with non-livestock, overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement can lead to hurting communities and also people's livelihood.

I know the local community compost's livestock manure very responsibly within the guidelines of experts and the guidance of Washington State University and others. Most share the composted product with my neighbors for their garden as well as spreading it on pastures. Those adjacent to streams, rivers, ponds, lakes, etc. are very concerned about doing it right to not harm the environment and ecosystem. The rule does not clearly allow composting and spreading livestock manure. Livestock are herbivores. Their manure does not have the pathogens that are present in carnivores such as dogs and cats. If this rule does not clearly state that the composting and spreading of livestock manure is allowed, it will be up to local health officers to make this judgment which will likely be different from jurisdiction to jurisdiction. If I will be required to annually remove my horse's manure, the cost will be extremely cost prohibitive in equipment and other fees. In which the organization taking this compost will then just compost it and sell it in the same way I would have used it.

In addition rules regarding livestock are vague and could affect this vital resource in maintenance of our local trails and public areas. Just the BCHW use stock all year to aid all government agencies in keeping trail access open to all users around the state.

I, also, would ask that the BOH delay the Draft Policy proposal in June and that a work group/task force is formed to vet out these concerns.

Thank you for your consideration.

Regards, James Thompson

From: Janet Young

Sent: 4/29/2022 11:41:55 AM

To: DOH WSBOH

Cc:

Subject: Board Decision on Covid-19 vaccines

External Email

After listening to all of the Board and TAG meetings, I am pleased with the thorough consideration of the need or not to vaccinate children in our state for Covid-19. I appreciate all of the time each member had to spend in their decision making.

I am very appreciative of the Board's decision not to recommend mandatory Covid-19 vaccination for Washington's school children. This is a very serious subject that parents need to ponder and make a decision for their own children. We do not know the long-term effects of this vaccine in children.

Sincerely, Janet M. Young Maple Valley, WA April 29, 2022

From: Parkvala Shaklee Sent: 6/2/2022 8:51:52 PM

To: DOH WSBOH

Cc:

Subject: No Covid Shots for our Children

External Email

The title of the email says it all. Kids are not susceptible to covid and requiring covid vaccinations for our children is criminal when the data clearly shows the risks out weigh the benefits!

Also please support agenda item 13, the citizen petition for rule making. Anyone receiving a shot should be given information pertaining to EUA and clinical trial information!

Thank you!

Susie Latvala Have a fabulous day! From: Brian Schlottmann Sent: 5/2/2022 2:23:24 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Comments on Domestic Animal Waste



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External Email

Thank you for the opportunity to review and provide comment on this rule revision.

In general, I think these are good changes and they support the protection of human and environmental health. In our county, the majority of complaints that we received on the topic of animal waste, is with regard to household pets and either the burial of dead animals or storage/disposal of pet waste. The language you're proposing here supports the changes we're pursing locally however we have slightly varying definitions.

I do see our County citing this code if its adopted prior to our local code adoption as well as in the future depending on the situation and need for state supported enforcement. There are specifics within your proposed code that we may likely incorporate language you've used – specifically on the type of storage noted in 3(C)(i and ii).

If interested, here is the language we're pursing in Clark County:

24.12. 245 Animal Waste Handling

- 1. Disposal of Dead Animals. Dead animals shall be handled and disposed of in a manner consistent with WAC 246-203-121
- https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fapp.leg.wa.gov%2FWAC%2Fdefau203-
- 121&data=05%7C01%7CWSBOHProposedAnimalWasteRule%40sboh.wa.gov%7C10ef5535eda749e3508f0
- . The owner of the animal or the owner of the property on which the animal is found must immediately cover and properly dispose of the carcass within 72 hours after the death or discovery. The carcass shall be disposed of by burial, landfilling, incineration, composting, rendering, or another method approved by health officer that is not otherwise prohibited by federal, state, or local law or regulation.
 - a. Animal carcasses weighing less than 30 pounds can be double bagged and

disposed of as municipal solid waste.

- i. Animals weighing more than 30 pounds may be disposed of as municipal solid waste at an approved solid waste handling facility with prior approval from the facility.
 - b. Animal Burial Sites. Burial of dead animals shall comply with the following:
- i. Ensure the burial site is at least 100 feet away from any drinking water well, spring, stream, lake, surface water and/or water body;
 - ii. Cover the carcass by at least three feet of soil;
- iii. Cover the carcass in a manner to prevent other animals from digging up the remains;
- iv. Envelop the carcass in unslaked lime in cases of death from a communicable disease and comply with all applicable federal, state and local regulations;
- v. Animals may not be buried in a manner likely to contaminate ground water. This includes but is not limited to areas designated as wetlands or hydric soils and in areas with equal to or less than 10 feet to surface water per Clark County GIS.
- vi. If more than expected animal deaths occur, the owner operator shall report the incident to Public Health. In the event of more than expected animal deaths, approval or on-site burial will be determined by the health officer on a case-by-case basis.

- 2. Animal manure (feces) and bedding. Handling and disposal of animal manure and pet waste shall comply with the following requirements:
 - a. Agricultural waste handling and on-farm vegetative waste.
 - i. The duration of storage of the entire pile is limited to one year.
- ii. Limited to the amount that will be applied to a site during a one-year period.
- 1. Subsequent accumulation under the same conditions is allowed at the same location after the entire pile has been used.
- iii. Shall not be allowed to accumulate in any place where it can negatively impact any source of drinking and/or surface water.
- 1. Ensure the pile is located at least 100 feet away from any drinking water well, spring, stream, lake, surface water and/or water body.
- 2. Agricultural waste may not be stockpiled in areas designated as wetlands or hydric soils per Clark County GIS.
 - b. Non-agricultural handling (i.e., household pets).
- i. Shall be stored and disposed of in a manner which does not create a public health nuisance or pollute surface waters of the state;
 - ii. Shall be removed at a frequency sufficient to not create a public

nuisance or at a minimum of once per week;

iii. Should be bagged, containerized and disposed of through routine garbage service or at a local transfer station

iv. Pet waste shall not be disposed of in a domestic on-site sewage system or to a sewer treatment facility via the sanitary sewer system without Public Health approval.

Thanks again,

Brian

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.clark.wa.gov%2F&data=05%

Brian Schlottmann | he I him I his

Environmental Health Director

PUBLIC HEALTH

564-397-8258

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.facebook.com%2Fpages%2FCounty-

WA%2F1601944973399185&data=05%7C01%7CWSBOHProposedAnimalWasteRule%40sboh.wa.gov%7C1

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FClarkCoWA&data="https%3A%2F%2Ftwitter.com%2FClarkCoWA&data="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FClarkCoWA&data="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FClarkCoWA&data="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FClarkCoWA&data="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FClarkCoWA&data="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FClarkCoWA&data="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FClarkCoWA&data="https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/?url=https://gcc02.safelinks.protection.outlook.com/protection.outlook.

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From: Arne Christensen

Sent: 5/26/2022 12:40:51 PM

To: DOH WSBOH

Cc:

Subject: Covid vaccine requirements

External Email

Hello:

The covid infections the governor and lieutenant governor now have, after each of them received 4 vaccine shots, is further evidence that the state should not be punishing people for waiting to decide whether they need to get one of the vaccines. The vaccine mandates should be repealed now. Also, the prospect of a covid vaccination requirement for the state's public school students should be explicitly rejected unless a sterilizing, fully effective vaccine is developed.

Arne Christensen

From: Judy Babb

Sent: 4/27/2022 9:18:39 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: animal waste ruling

External Email

requesting to postpone the draft proposal from June's hearing and allow a work group/task force of stakeholders to convene and sort out the concerns.

Among the many concerns: mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officer), and more.

Sent from Yahoo Mail on Android

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.onelink.me%2F107872968%3l

From: Debra Hawkins

Sent: 4/27/2022 3:26:38 PM

To: DOH WSBOH Proposed Animal Waste Rule

Subject: Postpone until we can work together!

External Email

Hello,

I would like to ask that you postpone the draft proposal from June's hearing. Please allow us to work as a united front to sort out the concerns that are out there. We want to work together for the good of all!

Take care,

Debra Hawkins

Back Country Horseman member and horse owner

From: Jennifer Zehrung Sent: 6/1/2022 7:57:36 PM

To: DOH WSBOH

Cc:

Subject: RE: No Means No

External Email

My family and I are adamantly opposed to any Covid shot that is required or added to the requirements for school in Washington State. I have a family member who developed blood clots in their leg after the Covid shot. My family and I do not consent, and we will not be taking this shot. This injection does not stop transmission and is NOT safe. We will NOT comply.

The Zehrung Family

From: Nancy the Soul Dancer

Sent: 5/5/2022 2:04:35 PM

To: DOH WSBOH

Cc:

Subject: follow up public comment to VAC meeting today

External Email

Greetings to the WABOH and WADOH,

Thank you for allowing public viewing of your V.A.C. (Vaccine Advisory Council) meeting today.

I especially appreciated the public comment section....ALL ten minutes of it! WOW , do you really want to hear from the public by providing only 10 minutes?? DiD YOU NOTICE HOW MANY of your experts CHECKED OUT OF THE MEETING WHEN IT WAS TIME FOR PUBLIC COMMENT?? Does that tell you anything about how closed minded and one-sided this discussion is???

At least the WABOH previous meeting allowed 30 minutes where EVERY public comment was in OPPOSITION TO FORCING THE ADDITION OF THE COVID SHOT for THE VAC SCHEDULE for SCHOOL ENTRY!

It is sooo transparent what is really going on with the V.A.C, WSBOH WSDOH, etc.! There are many more strong and highly committed people in opposition to this agenda than you realized, more than any of the minions who are bowing down to this nefarious agenda! (AND more then you allow to speak during public comment.)

Censorship, DE platforming, discrediting experts who are bringing out the Truth of this, far outnumber the ones who are minions to the F@uci-Big Pharm and Gates Alliance for profit and totalitarian control. We the People will not comply. Right is on our side! Our inalienable Rights for LIFE*, LIBERTY* and the PURSUIT OF HAPPINESS* are GOD GIVEN RIGHT that you cannot take away or edict away!

*LIFE: This COVID "vaccine" DOES NOT promote life! In fact it does the opposite: it KILLS BABIES in uterus at an exponential rate higher than normal in the women who take this shot while pregnant. The doctors and midwives in Wa hospitals are being told by the admin. that they may not give medical exemptions to these pregnant women or they will lose their job and possibly their license! (Dr. Aisia Kachikis, UW oby-gyn dr., I wonder if you would like to be a co-investigator for a study funded by Pfizer and Maerk that would look into this data?!) Is there any addition science needed from this reported/underreported death and injury from this toxic experimental gene therapy product?

*LIBERTY: Mandating and coercion to take this shot or else lose one's livelihood is in violation of both the U.S. Constitution and the WA state Constitution. No emergency

powers act (for now over 790 days!) can justify such tyranny on the people! Hundreds, thousands of people, have lost their jobs due to this fraudulent agenda.

*PURSUIT OF HAPPINESS; This nefarious agenda supported by the minions to the corrupted politicians and federal agencies and officials has caused a mental health epidemic of huge proportion! Suicide is the #1 cause of death in teenagers. Fear, anxiety and depression reign as #1 issues for millions of adults.

Need I say more? Perhaps you have read this far? Perhaps not.

I will close by saying....

Does it seem interesting to any of the distinguished members that ALL of the public comment is in OPPOSITION TO ADDING THE COVID 19 shot TO SCHOOL AND DAYCARE ENTRY. These comments are will articulated and based on proven research and uncensored , non-propagandized reports.

I am curious how can and why the many experts on this panel and this meeting still hold to the scenario and nefarious agenda that these COVID shots are safe and effective and purport that the benefit exceeds the risks. The real science and Truth shows that the RISKS far outweigh the benefits, if any!

The Light and Truth of God reigns and will be victorious in and through all of this!

I AM a minion to that!

- Militaria

From: Mitzi Schindele

Sent: 4/28/2022 12:48:14 PM

To: DOH WSBOH Proposed Animal Waste Rule

Subject: BCHW COMMENT ON KEEPING OF ANIMALS



attachments\B1FB1B8D3FEA4F51_Animal Waste Letter to BOH.pdf

External Email

From: Eva Zsido

Sent: 4/21/2022 1:40:09 PM

To: DOH WSBOH

Cc:

Subject: Commit to no COVID vaccine mandates on children

External Email

Dear Washington State Board of Health,

I urge you to accept the TAGs recommendation and choose to NOT mandate covid vaccines on our children. Our state government should NOT be mandating Covid vaccines on our children. They are at extremely low risk for Covid and these medical decisions should be left in the hands of parents and their family doctors.

Sincerely,

The Citizens of Washington State

From: j

Sent: 5/28/2022 7:38:51 PM

To: j Cc:

Subject: When WE ALL STAND TOGETHER.....GOD WINS! Please SHARE this with

EVERYONE!

External Email

Dear Ones,

Dr. Sandra Rosa Michael is revealing to the world her scalar light energy healing machines.....this is historic, HUGE!! She is a divinely placed Master to help bring healing to the entire world. Please, please listen to this amazing, enlightened woman. This video can change your life!! "When WE ALL STAND TOGETHER....GOD WINS!" Love to all, Mary

THE REVOLUTION OF HEALING | Advancing Beyond MedBed Technology | SHARE THIS EVERYWHERE!!! - YouTube

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.youtube.com%2Fwatch%3Fw

From: Isaac Schlittenhart Sent: 6/3/2022 7:48:13 AM

To: DOH WSBOH

Cc:

Subject: Mandatory COVID vaccines for school children

External Email

Hi there,

I wanted to let the board know that I do not support mandatory COVID vaccines for children to attend school. Recently Pfizer argued in court that they are exempt from a lawsuit regarding liability because they created a prototype. I for one do not want my 4 school aged children being forced to take a prototype to attend school. Thank you,

Isaac

https://invesbrain.com/pfizer-moves-to-dismiss-lawsuit-from-covid-19-vaccine-trial-citing-prototype-agreement/

<a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Finvesbrain.com%2Fpfizer-moves-to-dismiss-lawsuit-from-covid-19-vaccine-trial-citing-prototype-agreement%2F&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C7e35062d6cd64e379ef908da45700c4a%3

Francis El ATNE Kalan

From: ELAINE Kohler

Sent: 4/27/2022 3:07:27 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Proposed Animal Waste Rule

External Email

To whom it may concern,

As a BCHW member and 2 horse owner on a smaller piece of property, I am requesting a postponement of the draft proposal from the June's hearing. I suggest they allow a work group/task force of stakeholders to convene and sort out the concerns.

Thank you for your time and consideration.

Sincerely,

Elaine Kohler eckohler@msn.com

France Classes Church D (CDOII)

From: Glasoe, Stuart D (SBOH) Sent: 5/9/2022 11:11:15 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: FW: Upside Down letter, Back Country Horsemen



attachments\6190A3F143BE412D_Animal Waste Letter to BOH.pdf

Stuart Glasoe

SBOH Health Policy Advisor

360-236-4111

From: Hisaw, Melanie (SBOH) < Melanie. Hisaw@sboh.wa.gov>

Sent: Friday, May 6, 2022 4:11 PM

To: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>

Cc: Herendeen, Lindsay (SBOH) < Lindsay. Herendeen@sboh.wa.gov>

Subject: RE: Upside Down letter-done

Happy to help.

-Melanie

From: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov

<mailto:Stuart.Glasoe@sboh.wa.gov> > Sent: Friday, May 6, 2022 2:45 PM

To: Hisaw, Melanie (SBOH) < Melanie. Hisaw@sboh.wa.gov

<mailto:Melanie.Hisaw@sboh.wa.gov> >

Cc: Herendeen, Lindsay (SBOH) < Lindsay. Herendeen@sboh.wa.gov

<mailto:Lindsay.Herendeen@sboh.wa.gov> >

Subject: Upside Down letter

Melanie, the attached email includes a comment letter on the animal waste rule. It's upside down and I don't seem to have access to the tool in my version of Adobe reader to rotate it. Can you rotate and send it back so I can read and catalogue the comments? Thanks.

Health Policy Advisor

Washington State Board of Health

stuart.glasoe@sboh.wa.gov <mailto:stuart.glasoe@sboh.wa.gov>

360-236-4111

Website

- https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2F&data=05%7C01, Facebook
- https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.facebook.com%2FWASBOH8, Twitter
- https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FWASBOH&data=0

From: Sara Cate

Sent: 4/18/2022 8:07:09 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: please consider my comments below

External Email

Dear leadership,

I am a physician with a background in public health andI'm writing to state my concern over the changes that the Washington Department of Health (WaDOH) is proposing for WAC 246-203-130. This rule is currently titled, "Keeping of animals", but the proposed new title will be "Domestic animal waste". From my reading it sounds like the WaDOH will no longer regulate the pollution caused by farm animals. Instead, they will focus entirely on the waste produced by domestic animals such as cats and dogs. This makes no sense as there are approximately 100,000 dairy cows in the Lower Yakima Valley (LYV). People are suffering because of the pollution caused from the incredible volume of manure produced and the water and air pollution resulting from this incredible concentration of dairy cows. It makes no sense that the waste produced by family pets is more significant in terms of health impacts compared to that produced by factory farm animals!

WaDOH has a moral and regulatory duty to address the pollution caused by farm animals, and protect the health of the public. I strongly oppose these changes.

Sara Cate, MD, MPH

Yakima Washington

From: C Parks Sent: 4/21/2022 11:30:57 PM To: DOH WSBOH Cc: Subject: Communicating With Board Members External Email I understand that you will be deciding tomorrow whether or not to require Covid vaccinations for school-aged children. I would like to support the idea of requiring vaccinations. As we know, kids can help spread the disease, even if their symptoms are mild. We also know that many people in an enclosed space (like a classroom or sports event) increases the chance of spreading the disease. We also know that unvaccinated people are most likely to get and to spread the disease and to die from it. Some of those who die are children. Covid vaccinations shouldn't be any different than Measles or Polio vaccinations. Making Covid vaccinations a requirement will result in more kids getting vaccinated, even if people are grumpy about it. This is about protecting the community, protecting vulnerable people who can die if they contract this disease. My family had young people who died from polio years ago, before there was a vaccine. The grief of those deaths has carried on down the years. I want to have to repeat that with Covid deaths. Covid is something we now have an answer to. There is no need for any more people to die or become disabled from it, because we have effective vaccines to prevent that. Let's use them to protect our kids. Sincereley,

Vancouver, WA

Carrie Parks

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F (CDOU)

From: Kahler, Kelie (SBOH) Sent: 4/29/2022 11:36:45 AM

To: DOH WSBOH

Cc:

Subject: FW: Board Decision on Covid-19 vaccines

From: Janet Young <antiejan@gmail.com> Sent: Friday, April 29, 2022 11:19 AM

To: Kahler, Kelie (SBOH) < Kelie. Kahler@sboh.wa.gov>

Subject: Board Decision on Covid-19 vaccines

External Email

After listening to all of the Board and TAG meetings, I am pleased with the thorough consideration of the need or not to vaccinate children in our state for Covid-19. I appreciate all of the time each member had to spend in their decision making.

I am very appreciative of the Board's decision not to recommend mandatory Covid-19 vaccination for Washington's school children. This is a very serious subject that parents need to ponder and make a decision for their own children. We do not know the long-term effects of this vaccine in children.

Sincerely,

Janet M. Young

Maple Valley, WA

April 29, 2022

F D''II O

From: Bill Osmunson

Sent: 6/2/2022 7:03:56 AM

To: DOH WSBOH,wsdoh@sdoh.wa.gov

Subject: Cost Benefit Risk Analysis Fluoridation - Osmunson

attachments\9550859D0ECF4884_WSBH 6 2 22 Fluoridation Cost Benefit Risk Osmunson.pdf

External Email

Keith Grellner, Board Chair Board Executive Director Umair A. Shah, Secretary of Health Tao Sheng Kwan-Gett, Chief Science Officer Representative Bill Ramos

I treat dental fluorosis, damage from ingesting too much fluoride, damage both functional and cosmetic. I doubt any of you treat the damage from too much fluoride. The EPA funded research, estimated cost of treating functional dental fluorosis damage (chipped and brokent teeth) is greater than the estimated cost of cosmetic damage from fluoridation. 70% of children have dental fluorosis, most is minor but all is damage. And a sign of presumed brain damage.

I would thank the Board for contributing to dental fluorosis with fluoridation to help support dentists such as myself . . if it weren't so sad to intentionally harming children so they desire treatment for the damage. The Board is contributing to the damage and ethically have the legal power to help protect the public.

When the estimated damage from excess fluoride is included in a cost benefit analysis, the cost of damage exceeds benefit. The Board is contributing to the wasted expense.

My desire for asking the Board for their cost-benefit-risk analysis was for the Board to crunch the numbers from research and come a conclusion on their own. My request for a copy of the WSBH's Cost-Benefit-Risk Analysis has been unanswered and I assume the Board does not have a cost-benefit-risk analysis and cannot provide one.

In an effort to assist the Board and protect the Public, I have spent considerable time to develop one for the Board, see attached.

Thank you for your careful review and for the sake of the public's health, please take action. I am willing to help if you ask.

My desire is to protect the public from harm caused by excess fluoride ingestion.

Sincerely,

Bill Osmunson DDS MPH 425.466.0100 1418 - 112th Ave NE Bellevue, WA. 98004 From::Bill Osmunson DDS MPH Cosmetic and General Dentist

Board Chair: American Environmental Health Studies Project

1418 112th Ave NE, Bellevue, WA 98004

425.466.0100

bill@teachingsmiles.com

A COST BENEFIT-RISK ANALYSIS OF FLUORIDATION FOR THE WASHINGTON STATE BOARD OF HEALTH

"The continued increase in fluorosis rates in the U.S. indicates that additional measures need to be implemented to reduce its prevalence." Fluoridation (addition of fluoride to public water), cessation is the most logical source to reduce excess fluoride exposure.

Abstract/summary: The Washington State Department of Health (WSDH) has advised that the Washington State Board of Health (WSBH) has Jurisdiction in Washington State over the addition of fluoride to public water systems. Therefore, it is the ethical responsibility for the Board to be current on the risks and benefit, if any, for all individuals and protect the public with an appropriate label.

As a practicing comprehensive, cosmetic, general dentist, I treat functional and cosmetic damage from dental fluorosis and dental caries contributed by the WSBH's recommendation of fluoride supplementation in water. The estimated cost to treat dental fluorosis damage exceeds the estimated cost of benefit, Thus, fluoridation makes no financial, ethical, or Public Health sense. Excess fluoride exposure financially benefit dentists. When the estimated harm from developmental neurotoxicity is included, public health agencies must no longer support fluoridation. We can fix teeth, not brains.

¹ Wiener RC, Shen C, Findley P, Tan X, Sambamoorthi U. Dental Fluorosis over Time: A comparison of National Health and Nutrition Examination Survey data from 2001-2002 and 2011-2012. J Dent Hyg. 2018 Feb;92(1):23-29. PMID: 29500282; PMCID: PMC5929463.

Estimated costs Per Person Per Year (PPPY):

Cost to fluoridate water \$3-\$10

Averted caries \$6.08

Dental fluorosis Treatment \$3.24-\$153

IQ loss \$2,156 to \$2,552

Cost estimates report benefit from fluoridation only if harm is NOT included.

Real world estimates of fluoridation's benefit to teeth including all costs and also including harm from dental fluorosis to teeth, do not report a cost savings. Presumed neurotoxic harm to the developing brain, potential ADHD endocrine, cancer, thyroid, bone, enzymatic harm, and lack of environmental justice add additional costs which must be included in a cost-benefit-risk analysis. The evidence is clear, estimated fluoridation harm far exceeds estimated benefit.

Toxicology's definition of two terms: "hazard" and "risk." Sunshine can be beneficial. A hazard is potential danger, such as sunshine. Risk is the likely hood of danger/harm, or how much of the hazard causes danger/harm, such as a sunburn. How much sunshine becomes a danger depends on several factors and host sensitivity. "The dose makes the poison." (Perecles

Fluoride is similar. Topical fluoride can be beneficial. Ingesting fluoride has risk of danger and actual harm and the FDA approved label includes the warning "Do Not Swallow." Ingesting fluoride has strong evidence of actual harm. We cannot change the hazard of a chemical but we can manage the risk of harm. (See also for a simple review of toxicology)

Bioethics recommends we evaluate the risks from fluoridation based on "potential" risk at total exposures. Sometimes proponents of fluoridation speak only about the source of fluoride which comes from fluoridated water. However, an estimated third to two thirds of fluoride comes from other sources. The dosage fluoridation provides needs to be at least doubled or tripled to achieve total fluoride exposure.

Dental fluorosis is a known risk from excess fluoride exposure, the highest level of confidence.

Developmental neurotoxicity, as evaluated with IQ, is presumed to be a risk and also greater confidence than potential risk. "Potential" risks include ADHD, cancer, thyroid, bone, endocrine,

enzymatic system, mitochondria, GI and kidney harm and the evidence is strong enough for those to stop fluoridation. With 70% of the USA children having dental fluorosis, fluoridation should be stopped just for excess fluoride ingestion. Most developed countries do not fluoridate public water. Public Health's intention to help the poor and those with low intelligence are the very people least able to compensate for the harm and in most need of health education. Fluoridation is not supported by Bioethics, drug regulatory agencies, most developed countries, total exposure, quality of research, environmental justice, toxic substance laws, cost savings and better alternatives are available. Uncontrolled dosage, an uncertainty factor, individual sensitivity and the cumulative harm from all toxic chemical exposures demands action.

Individual dosage is not controlled when dispensed in the public water systems because not everyone drinks the same amount of water and different amounts at different ages. Infants on formula made with fluoridated water receive about 140 times more fluoride than mother's milk. Fluoride at 0.7 mg/l in water to make infant formula does not fit within WSBH guidelines within the first year of life.

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Current scientific evidence supports the USA Environmental Protection Agency (EPA) scientists statement in 2001:

"In summary, we hold that fluoridation is an unreasonable risk. That is, the toxicity of fluoride is so great and the purported benefits associated with it are so small - if there are any at all – that requiring every man, woman and child in America to ingest it borders on criminal behavior on the part of governments."²

²Dr. J. William Hirzy, Senior Vice-President, Headquarters Union, US Environmental Protection Agency, March 26, 2001

I. BIOETHICS: Sound Bioethics Presupposes Sound Science.

I have previously requested the WSBH's cost-benefit-risk analysis and the Board has remained silent.

This report is the most up to date risk-benefit of fluoridation. The addition of fluoride to public water lacks individual consent, randomized controlled trials (quality research), lacks known mechanism of benefit, exceeds "potential" harm with probable and known harm, is without label, adulterated, misbranded and alternatives are available at less expense for those choosing to ingest fluoride.

Note: in contrast, topical fluoride has good scientific evidence of efficacy and the US Food and Drug Administration (FDA) correctly advises on the toothpaste label, "Do Not Swallow."

Since the 1940's bioethical principles have been reasonably constant.³

"The ethical validity of fluoridation policy does not stand up to scrutiny relative to the Nuremberg Code and other codes of medical ethics, including the Council of Europe's Biomedical Convention of 1999" 4 and artificial water fluoridation must be abandoned.⁵

Dental caries harms the individual, not others. Not to minimize discomfort and harm from dental caries, but dental treatment is sometimes considered elective as a "non-contagious infectious disease" and not highly lethal.

In both clinical practice and research,⁷ individual informed consent and autonomy of a competent individual is a self-evident bioethic principle. In contrast, public health interventions may not have individual informed consent and therefore need to be held to an even higher standard of confidence.

³Grady C. Institutional Review Boards: Purpose and Challenges. *Chest.* 2015;148(5):1148-1155. doi:10.1378/chest.15-0706

⁴Douglas W. Cross & Robert J. Carton (2003) Fluoridation: A Violation of Medical Ethics and Human Rights, International Journal of Occupational and Environmental Health, 9:1, 24-29, DOI: 10.1179/107735203800328830

⁵Rajarajan, Giftson; Kumar, R. Pradeep; Priyadorshini, S. Pavithra, A review on the ethics of artificial water fluoridation. Drug Invention Today . Jan2019, Vol. 11 Issue 1, p102-107. 6p. 1 Chart

⁶Vieira, AR, Genetics and Caries- Prospects, Braz Oral Res., (São Paulo) 2012;26(Spec Iss 1):7-9

⁷⁴⁵ CFR part 46 Subpart D §46.404. "§46.116 General requirements for informed consent. (2) A description of any reasonably foreseeable risks or discomforts to the subject;"

For example, a clinician making an error may harm that patient. Research error may harm hundreds. WSBH error may harm hundreds of thousands.

The Nuffield Council is consistent with the CDC (Centers for Disease Control and Prevention) ethics, applicable to the WSBH and is more specific to fluoridation, advising:

"public health policy involving the water supply should be considered in relation to:

- I. the balance of risks and benefits
- II. the potential for alternatives that rank lower on the intervention to achieve the same outcome.
- III. the role of consent where there are potential harms"8 (emphasis supplied)

Bioethics does not include minimizing evidence of risk and maximizing claims of benefit. The public rely on the WSBH's recommendations in their decision making process regarding fluoridation. To avoid very serious harm to hundreds of thousands, the WSBH must have high confidence in their review of empirical evidence as it develops on fluoride ingestion.

⁸Ethics Consultation Report Ethical Considerations in Community Water Fluoridation, by the Public Health Agency of Canada's Public Health Ethics Consultative Group, December 18, 2018 p.2.https://www.caphd.ca/sites/default/files/Ethical%20Considerations%20for%20Community%20Water%20Fluoridation.pdf

II. Jurisdiction: No Agency Authorized to Approve Fluoride Ingestion with Intent to Prevent Dental Caries has published a Benefit Risk Analysis or Approved Fluoridation

FDA: In the USA, Congress has given the Food and Drug Administration (FDA) jurisdiction over substances used with the intent to prevent disease such as fluoride. The FDA testified to Congress that fluoride is a drug. Fluoride toothpaste is approved and has a label with warning, "Do Not Swallow," referring to a pea size amount, 0.25 mg, the same amount as a glass of fluoridated water. Clearly the public is receiving mixed messages, "Do Not Swallow" the same amount of fluoride administered without choice in each glass of public water. We should not be surprised the public opinion is polarized. Sodium fluoride is listed as a drug in the Pharmacopeias.

The FDA notified 35 fluoride manufacturers of fluoride supplements, ". . . . there is no substantial evidence of drug effectiveness as prescribed, recommended or suggested in its labeling. . . marketing is in violation of the new drug provisions of the Federal Food, Drug, and Cosmetic Act; they have, therefore, requested that marketing of these products be discontinued." ¹¹ The FDA more recently warned manufacturers of fluoride supplements their product is not approved.

Fluoridated bottled water did not go through the NDA process and has never been approved. The FDA was notified a health claim would be made by manufacturers and the Drug section of the FDA does not regulate bottled water.

WASHINGTON STATE: In Washington State, the Board of Pharmacy (WSBP) has (had) jurisdiction over determining whether fluoride is a drug and the WSBH has jurisdiction over dispensing the fluoride drug. When asked, the WSBP confirmed, fluoride is a drug.¹² In fact, the Washington State laws gave the WSBH little choice.

RCW 69.38.010 "Poison" defined. As used in this chapter "poison" means:

(1) Arsenic and its preparations;

(2) Cyanide and its preparations, including hydrocyanic acid; Strychnine; and

(3) (4) Any

other substance designated by the state board of pharmacy which, when introduced into the human body in quantities of sixty grains or less, causes violent sickness or death."

⁹21 USC 321 (g)(1)(B)

¹⁰Congressional Investigation 2001

¹¹DRUG THERAPY 1975

¹²Letter to the Author Bill Osmunson, June 4, 2009, from the Washington State Board of Health

Sixty grains is 3,887 mg.

Whitford (1996) "it may be concluded that if a child ingests a fluoride dose in excess of 15 mg F/kg, then death is likely to occur. A dose as low as 5 mg F/kg may be fatal for some children. Therefore, the probably toxic dose (PTD), defined as the threshold dose that could cause serious or life-threatening systemic signs and symptoms and that should trigger immediate emergency treatment and hospitalization, is 5 mg F/kg." ¹³

For a 5 kg child a presumed lethal dose could be 25 mg. The WSBP had a simple calculation to make, is 25 mg less than 3,887 mg? Of course 25 is less than 3,887 and therefore fluoride is a poison. However, fluoride is exempt from poison laws when regulated under either pesticide or drug laws. The WSBP correctly determined fluoride is a drug when used with the intent to prevent disease in humans and not a pesticide. RCW does not exempt poisons when regulated as foods. In fact, the intentional dispensing of poisons into water is prohibited.

Fluoride is not exempt from poison laws when regulated as a food.

The jurisdiction of fluoride is then kicked over to the FDA which has not approved fluoride as a drug and to the WSBH which after 15 years of petitions has remained silent or denied petitions to protect the public.

RCW <u>57.08.012</u> Authorizes fluoridation by vote of commissioners or electors. In effect, the complex scientific toxicology, pharmacology, epidemiology, physiology, biochemistry, dentistry and medicine is turned over to 50% of a person's neighbors to medicate everyone with an unapproved drug.

Although the WSBH has remained silent, the Board certainly has the responsibility to protect the public at a minimum with appropriate label and recommendation.

The FDA process for evaluating a new drug should be considered by the WSBH and includes a benefit-dose-risk analysis with randomized controlled trials, label and oversight. The manufacturer before marketing presents the research on efficacy at a specific dosage to the FDA. If the substance is effective at the dosage, the risks are evaluated and a label is made with dose and warnings.¹⁴ The WSBH has a role in fluoridation and must protect the public.

¹³ Whitford G. (1996). Fluoride Toxicology and Health Effects. In: Fejerskov O, Ekstrand J, Burt B, Eds. <u>Fluoride in Dentistry</u>, 2nd Edition. Munksquard, Denmark. p 171."

¹⁴FDA Development & Approval Process Drugs, Center for Drug Evaluation and Research, https://www.fda.gov/drugs/development-approval-process-drugs

EPA: The Safe Drinking Water Act¹⁵ includes, "No national primary drinking water regulation may require the addition of any substance for preventive health care purposes unrelated to contamination of drinking water." Congress has prohibited the EPA from adding anything to water which has intent to prevent disease.¹⁶

The Environmental Protection Agency (EPA) advised, "the FDA, remains responsible for regulating the addition of drugs to the water supply for health care purposes." ¹⁷

The FDA avoids their responsibility by claiming the FDA does not regulate public water. In effect, no USA Federal Agency accepts jurisdiction over the addition of fluoride to public water, fluoridation, determining the efficacy, dosage and safety of ingested fluoride. The CDC does not evaluate or approve drugs. The WSBH is mistaken to rely on any Federally authorized agency for determining benefit, dosage, risk and label. Private industry promotes fluoridation for their benefit and has persuaded public health agencies to agree.

Proponents reference endorsements of fluoridation by over 100 organizations and claim, "*Not a single credibly recognized scientific group in the world OPPOSES community water fluoridation.*" ¹⁸ However, their definition of "world" appears to be parochial and limited primarily to English speaking Countries and any organization opposed to fluoridation is therefore not credible.

Austria: "toxic fluorides" NOT added

Belgium: encourages self-determination – those who want fluoride should get it themselves. Finland: "...do not favor or recommend fluoridation of drinking water. There are better ways of providing the fluoride our teeth need." A recent study found ...<u>"no indication of an increasing trend of caries...."</u>

Germany: stopped fluoridation. A recent study found <u>no evidence of an increasing trend of caries</u> Denmark: "...toxic fluorides have never been added to the public water supplies in Denmark." Norway: "...drinking water should not be fluoridated"

Sweden: "not allowed". No safety data available!

¹⁵⁴² U.S. Code § 300g–1 - National drinking water regulations

¹⁶FOIA Request HQ-FOI-01418-10

¹⁷Steve Neugeboren, Ass. General Counsel, Water Law Office EPA 2/14/2013

¹⁸American Fluoridation Society https://americanfluoridationsociety.org/debunking-anti-claims/myths/supporting-organizations/

Netherlands: Inevitably, whenever there is a court decision against fluoridation, the dental lobby pushes to have the judgment overturned on a technicality or they try to get the laws changed to legalize it. Their tactics didn't work in the vast majority of Europe.

Hungary: stopped for technical reasons in the '60s. However, despite technological advances, Hungary remains unfluoridated.

Japan: "...may cause health problems...." The 0.8 -1.5 mg regulated level is for calcium-fluoride, not the hazardous waste by product which is added with artificial fluoridation.

<u>Israel:</u> suspended mandatory fluoridation until the issue is reexamined from all aspects.: June 21, 2006 "The labor, welfare and health Knesset committee"

China: "not allowed"

Regarding Fluoride Post-harvest fumigant, and applicable to fluoridation, an EPA administrative Judge concluded: "EPA agrees that aggregate exposure to fluoride . . . does not meet the safety standard in FFDCA section 408. The fluoride MCLG (4.0 mg/L) is not protective of the effects of fluoride on teeth and bones; The fluoride MCLG is not protective of other neurotoxic, endocrine, and renal effects of fluoride; EPA has not adequately protected children; EPA cannot determine the safety of sulfuryl fluoride and fluoride in the absence of a developmental neurotoxicity study; EPA has underestimated exposure to fluoride; and EPA has committed procedural errors in violation of the Administrative Procedures Act (APA) (5 U.S.C. 551 et seq.)."19

Fluoride is not listed in food labels and no approved label for fluoridation or products used with fluoridated water are listed with warnings. Fluoridation is not an approved drug and is without label, misbranded,²⁰ and adulterated²¹ failing to conform to compendium standards of purity.

The absence of fluoride in the diet does not cause dental caries. Fluoride is not an essential nutrient. Dental caries are not caused by inadequate fluoride ingestion.²² No physiologic process in the body requires fluoride. Fluoride ingestion should not be compared to essential vitamins or minerals required for metabolic functions, the absence of which causes a disease.

¹⁹https://www.federalregister.gov/articles/2011/01/19/2011-917/sulfuryl-fluoride-proposed-order-granting-objections-to-tolerances-and-denying-request-for-a-stay
Consolidated Objections at http://www.fluoridealert.org/wp-content/uploads/sf-nov.2006.pdf.

²⁰FDA misbranded. https://www.fda.gov/medical-devices/general-device-labeling-requirements/labeling-requirements-misbranding

²¹Section 501(b) of the Food, Drug, and Cosmetic Act https://www.fda.gov/media/71979/download

²²Emsley J, Jones DJ, Miller JM, Overill RE, Waddilove RA. An unexpectedly strong hydrogen bond: ab initio calculations and spectroscopic studies of amide-fluoride systems. *Journal of the American Chemical Society*.
1981;103:24–28. [Google Scholar]

III. COSTS TO FLUORIDATE WATER.

Ran²³ reported costs to fluoridate water from \$0.11 to \$4.92 in 2013 U.S dollars per person per year (PPPY).

Ko²⁴ corrected for more factors and reported costs to fluoridate water ranged from "about \$10 and \$3 PPPY." Because Ko's estimate considers real world costs it will be used here.

Costs to purchase the bottled water for those not wanting fluoride should also be added to the costs of fluoridation. Assuming even 1% of the bottled water consumed is to avoid fluoride, 150 million gallons or 568 million liters of bottled water at \$1/liter adds an additional \$568 million dollars to the cost of fluoridation. An additional \$5 per person consuming the fluoridated water costs to fluoridate public water should be added. To keep this complex subject simple, I have stuck with Ko's estimate.

²³ Ran T, Chattopadhyay SK; Community Preventive Services Task Force. Economic Evaluation of Community Water Fluoridation: A Community Guide Systematic Review. *Am J Prev Med*. 2016;50(6):790-796. doi:10.1016/j.amepre.2015.10.014

²⁴ Ko L, Thiessen KM, A critique of recent economic evaluations of community water fluoridation, International Journal of Occupational and Environmental Health 2015 vol. 21 No. 2 91 DOI 10.1179/2049396714Y.0000000093

IV. BENEFIT of FLUORIDATION.

Ko has the most inclusive and accurate estimation of dental caries mitigation and reports fluoridation savings of \$6.08 PPPY (\$3-\$10 PPPY), which is used here. Serious limitations to the alleged benefit of fluoride ingestion must be noted.

1) No Known Mechanism

Mechanism: Fluoride works by interacting topically after teeth erupt. The evidence for its effectiveness when applied to erupted teeth is well supported. Fluoride incorporation into developing teeth is very minor and does not contribute to caries prevention. Fluoride is not a nutrient nor essential for any bodily function. A very small amount of ingested fluoride makes its way to saliva to provide some topical fluoride after tooth eruption, but this amount is 50 to 100 fold less than what is obtained from fluoride naturally occurring in food and beverages. "The enamel demonstrated significant transport hindrance for the ions, and the effective pore radii of the transport pathways in the enamel were found to be approximately 0.7-0.9 nm."²⁵

2) No Randomized Controlled Trials (RCT)

No RCT of fluoridation or fluoride supplements as pills or liquid have been published for infants, children or adults The only published RCT²⁶ gave 1 mg of fluoride daily to pregnant mothers and followed their child till age 5. No statistical reduction in dental caries was reported. The first RCT has started for fluoridated bottled water.²⁷

Without a known mechanism coupled with lack of RCTs, the FDA is correct determining the evidence of benefit from fluoride ingestion is "incomplete."

²⁵Wei Ren, Arif Baig, S Kevin Li, Passive and iontophoretic transport of fluorides across enamel in vitro., Journal of pharmaceutical sciences (2014-04-10) Millipore Sigma

²⁶Leverett DH, Adair SM, Vaughan BW, et al, - Caries Research, 1997 - karger.com https://www.karger.com/Article/Abstract/262394#

²⁷https://waterbeststudy.com

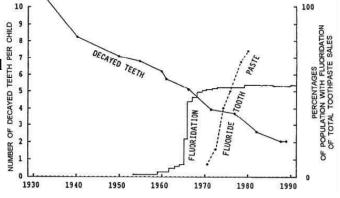
3) Limited Confidence in Current Fluoridation's Association with Dental Caries:

- A. Not one Study corrects for Unknown Confounding Factors such as the highly significant unknown causing caries decline from about 11.5 cavities to about 5.5 cavities before fluoridation.
- B. Not one Prospective Randomized Controlled Trial
- C. Socioeconomic status not controlled
- D. Inadequate size
- E. Difficulty in diagnosing decay
- F. Delay in tooth eruption not controlled
- G. Diet: Vitamin D, calcium, strontium, sugar, fresh and frozen year-round vegetables and fruit consumption not controlled.
- H. Total exposure of Fluoride not determined
- I. Oral hygiene not determined
- J. Not evaluating Life-time benefit
- K. Estimating or assuming subject actually drinks the water (about half of water ingested is now bottled water.)²⁸
- L. Dental treatment expenses not considered
- M. Mother's F exposure, Breast fed (almost no fluoride) and infant formula with a high dose of fluoride
- N. Fraud, gross errors, and bias not corrected.
- O. Genetics not considered

For example, Colquhoun²⁹ 1997 ISFR Published 1998 published the graph below. No one knows

what the unknown(s) were reducing caries prior to fluoridation. Those powerful unknowns have never been controlled for in research. The unknowns are more powerful than the possible effect of fluoridation.

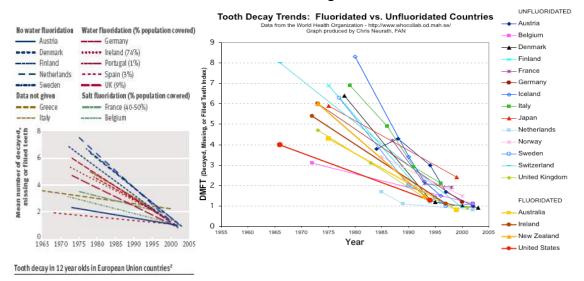
Highly unlikely the unknowns causing the caries decline could have gradually phased out while fluoridation was phased in.



²⁸International Bottled Water Association. https://bottledwater.org/bottled-water-consumption-shift/

²⁹Colquhoun 1997 ISFR Published 1998 http://www.fluoride-journal.com/98-31-2/312103-f.htm

Cheng³⁰ (left graph below) and Neurath³¹ using WHO data demonstrate in developed countries, dental caries have declined to similar low levels regardless of fluoridation or fluoridated salt.



4) No Known Effective Dosage

Without RCT published studies or FDA approval, the dosage mg/Kg/day to mitigate dental caries has never been determined. Concentration of fluoride in water is not dosage. Instead of a dosage, an Adequate Intake is used by the National Institute of Health.³²

Historical research suggested fluoridation was "remarkably effective," however, current research is less confident. A major review in 2000 from the Centre for Reviews and Dissemination at the University of York (York Review) concluded that the best available evidence suggested that fluoridation reduced the prevalence of caries, but found that the reduction was difficult to quantify from the evidence available. The authors also noted, "it is surprising to find that little high quality research has been undertaken."³³

³⁰Cheng, K. K., Chalmers, I., & Sheldon, T. A. (2007). Adding fluoride to water supplies. *BMJ (Clinical research ed.)*, *335*(7622), 699–702. https://doi.org/10.1136/bmj.39318.562951.BE

³¹Neurath C, TOOTH DECAY TRENDS FOR 12 YEAR OLDS IN NONFLUORIDATED AND FLUORIDATED COUNTRIES, Research Note Fluoride 38(4)324-325 November 2005.

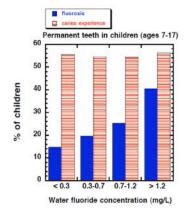
³² National Institute of Health. AI for Fluoride https://ods.od.nih.gov/factsheets/Fluoride-HealthProfessional/#:~:text=In%201986%2C%20guidelines%20from%20the%20U.S. %20Environmental%20Protection,to%20prevent%20dental%20fluorosis%20%5B%203%2C%2011%20%5D. Accessed May 17, 2022

³³McDonagh M, Whiting P, Bradley M et al. (2000) A Systematic Review of Public Water Fluoridation (York: NHS Centre for Reviews and Dissemination).

"The results show that the reviewed original studies on economic evaluation of caries prevention do not provide support for the economic value of caries prevention."³⁴

Iida et al data from 2009 demonstrates an increase in fluoride concentration increases dental fluorosis, blue lines, but caries experience is minor if any. (Graph of data by Thiessen)

lida, H., and Kumar, J.V. 2009. The association between enamel fluorosis and dental caries in U.S. schoolchildren. JADA 140:855-862.



Little has changed with fluoridation. According to Dye et al. (2015): "Untreated tooth decay was higher for Hispanic (36%) and non-Hispanic black (42%) adults compared with

non-Hispanic white (22%) and non-Hispanic Asian (17%) adults aged 20-64."

Cities fluoridated for over 50 years report a crisis of dental caries and Kentucky was awarded 50 years of 100% fluoridated by the American Dental Association at the same time Kentucky was number one percentage for those without any teeth.

5) Excess exposure. 70% of children are ingesting too much fluoride.

CDC "Dental fluorosis only occurs when younger children consume too much fluoride, . . . when teeth are developing under the gums." Fluoride ingestion prior to 6 years of age causes dental fluorosis.

Water fluoride concentration is not an individual dose, nor a valid indication of total exposure. Fluoridation gives more to everyone regardless of how much they are ingesting from other sources. Although the average intake of water is estimated at 927 ml/day for adults, 90th per-

³⁴Källestål C et al. Economic evaluation of dental caries prevention: a systematic review. Acta Odontol Scand. 2003 Dec;61(6):341-6.

³⁵http://www.cdc.gov/fluoridation/safety/dental_fluorosis.htm#a2 Accessed 10 15

centile is just over 2 liters and some drink over 10 liters/day.³⁶ To protect from potential harm, safety factor of 10 should be used just to protect those drinking the most water such as pregnant women and infants on formula made with fluoridated water.

Rates of dental fluorosis have increased from 10-15% to 70%, moderate/severe from 7% to 28% in the latest NHANES reports.³⁷ Dong's 2015-16³⁸ reporting 70% although lower moderate and sever percentage. Espinoza raised concern with the quality of data³⁹ which has Federal oversight and funding. Photographs were taken and could confirm data quality if released. Data was when fluoridation was at about 1 ppm in water. An estimated 15% decrease in total exposure may reduce the rate of dental fluorosis, but not enough.

In other words, 73% of children are on fluoridated water and 70% of all the children show signs of excess fluoride intake. When fluoridation started, the public was assured only perhaps 15% of the public would get dental fluorosis.

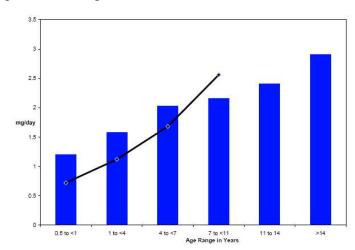


Figure 8-1. Total Daily Fluoride Intake Estimates Relative to the Proposed RfD Using 90th Percentile Drinking Water Intake Data for Consumers Only and the Mean Drinking Water Fluoride Concentration (0.87 mg/L)

There are numerous sources of fluoride, ". . . some children probably get more than the recommended amount of fluoride from toothpaste alone. . . "40 p 42.

The EPA Dose Response Analysis 2010, Figure 8-1, illustrates the percentage of children exceeding the RfD (EPA safe dose) if the EPA increased the RfD from 0.06 to 0.08 mg/kg/day.

³⁶Fluoride in Drinking Water: A Scientific Review of EPA's Standards, 2016. Chapter 2, pp 23-88.

³⁷Neurath C, Limeback H, Osmunson B, Connett M, Kanter V, Wells CR. Dental Fluorosis Trends in US Oral Health Surveys: 1986 to 2012. JDR Clin Trans Res. 2019 Oct;4(4):298-308. doi: 10.1177/2380084419830957. Epub 2019 Mar 6. PMID: 30931722.

³⁸Dong H, Yang X, Zhang S, Wang X, Guo C, Zhang X, Ma J, Niu P, Chen T. Associations of low level of fluoride exposure with dental fluorosis among U.S. children and adolescents, NHANES 2015-2016. Ecotoxicol Environ Saf. 2021 Sep 15;221:112439. doi: 10.1016/j.ecoenv.2021.112439. Epub 2021 Jun 22. PMID: 34166938.

³⁹ Lorena Espinoza Rachel Kaufmann, Corresondence Letter, Ecotoxicology and Environmental Safety, Volume 227, 20 December 2021, 112950 https://doi.org/10.1016/j.ecoenv.2021.112950 https://www.sciencedirect.com/science/article/pii/S0147651321010629?via%3Dihub

⁴⁰National Research Council 2006 p. 42.

In other words, EPA is doing the opposite of the NRC 2006 recommendation which reported EPA standards are not protective. EPA is "declaring" fluoride exposure safer and is being less protective. Even with increasing RfD, too many children are still ingest too much fluoride. (Percentage above the black line, previous page.)

Note, in their Figure 8-1 infants are not included, 10% of children and infants ingesting the most

fluoride are not included.

The National Institute of Health⁴¹ recommends 0.01 mg/day of fluoride birth to 6 months, compared to mother's milk with mean 0.004 mg/l. Formula fed babies on fluoridated water ingest an estimated average of 140 times more fluoride than breast fed babies.

I was unable to locate WHO's recommendation for fluoride concentration of water used to make infant formula and appears to be 1.5 mg/l.

Fluoride from tap water -babies fed formula made with fluoridated tap water are overdosed on fluoride

subject	volume fluid intake	fluoride concentration in liquid consumed	fluoride DOSAGE* (µg/ kg per day)	
5 kg baby fed breast milk	up to 1 L	≈ 0.005 ppm	1	
70 kg adult	1 L	0.7 ppm	10	
70 kg adult	4 L	0.7 ppm	40	
70 kg adult	2 L	2.0 ppm	57	
70 kg adult	1 L	4.0 ppm	57	
5 kg baby fed infant formula made with tap water	up to 1 L	0.7 ppm	140	

^{*}A dose refers to a specified amount of medication taken at one time. By contrast, dosage is the prescribed administration of a specific amount, number, and frequency of doses over a specific period of time. AMA Manual of Style

Zohoori⁴² "In conclusion, a relatively large proportion of fluoride intake is retained in the body in weaned infants."

⁴¹ National Institute of Health. AI for Fluoride https://ods.od.nih.gov/factsheets/Fluoride-HealthProfessional/#:~:text=In%201986%2C%20guidelines%20from%20the%20U.S.

^{%20}Environmental%20Protection,to%20prevent%20dental%20fluorosis%20%5B%203%2C%2011%20%5D. Accessed May 17, 2022

⁴² Zohoori, F., Omid, N., Sanderson, R., Valentine, R., & Maguire, A. (2019). Fluoride retention in infants living in fluoridated and non-fluoridated areas: Effects of weaning. *British Journal of Nutrition*, *121*(1), 74-81. doi:10.1017/S0007114518003008

6) Lack of Label.

Drugs and processed foods have labels to tell consumers recommendations and warnings. Without label, consumers don't know how much fluoride is in their foods such as mechanically deboned meat, tea, grapes etc. The only label is on fluoride toothpaste with a warning, "Do Not Swallow."

7) Systematic reviews of benefit

"Five systematic reviews between 2000 and 2015 that fluoridation reduces dental caries in children."⁴³ However, evidence of efficacy is based mostly on historical studies and lower quality.

The Cochrane systematic review is applicable to public health policy for the precise reasons it is criticized. Critics suggest the review was too restrictive.⁴⁴ Cochrane reviews primarily evaluate RCTs "for new drugs and clinical interventions for use with individuals, not public health initiatives targeted at populations."⁴⁵ Bioethics of a policy without individual consent should be more protective than one with individual consent and under their doctor's supervision. The FDA appears to be even more restrictive than the Cochrane review, reporting evidence at the same time period prior to the mid 1970's was "incomplete". Without individual consent and a world wide policy, WHO should require the same or greater confidence in the evidence.

The Cochrane review raised concerns for lack of studies to determine; current benefit, lack of benefit for lower socioeconomic status, lack of risk with fluoridation cessation, 97% of studies at high risk of bias, substantial between-study variation, and no studies met their criteria to determine effectiveness for adults.⁴⁶ Harm was not considered.

⁴³Lennon, M. The cochrane review of water fluoridation, Editorial, Community Dental Health (2015) **32**, 130–131

⁴⁴Rugg-Gunn, A., Spencer, A., Whelton, H. *et al.* Critique of the review of 'Water fluoridation for the prevention of dental caries' published by the Cochrane Collaboration in 2015. *Br Dent J* **220,** 335–340 (2016). https://doi.org/10.1038/sj.bdj.2016.257

⁴⁵Lennon, M. The cochrane review of water fluoridation, Editorial, Community Dental Health (2015) 32, 130–131

⁴⁶Iheozor-Ejiofor Z, Worthington HV, Walsh T, O'Malley L, Clarkson JE, Macey R, Alam R, Tugwell P, Welch V, Glenny AM. Water fluoridation for the prevention of dental caries. Cochrane Database of Systematic Reviews 2015, Issue 6. Art. No.: CD010856. DOI: 10.1002/14651858.CD010856.pub2. Accesse d 17 April 2022.

Current studies fail to report significant benefit. such as Maupome⁴⁷ McLaren⁴⁸ Slade⁴⁹ Meyer⁵⁰ Do⁵¹ Chankanka⁵²,⁵³ Choo-Wosoba⁵⁴. The CDC also states, "Ingestion of fluoride is not likely to reduce tooth decay."⁵⁵ The apparent benefit⁵⁶ of fluoride is the precipitation of the less soluble mineral phase of fluorapatite in the tooth structure, a topical action.

⁴⁷Maupomé G, Clark DC, Levy SM, Berkowitz J. Patterns of dental caries following the cessation of water fluoridation. Community Dent Oral Epidemiol. 2001 Feb;29(1):37-47. PMID: 11153562.

⁴⁸McLaren L, Singhal S. Does cessation of community water fluoridation lead to an increase in tooth decay? A systematic review of published studies. J Epidemiol Community Health. 2016 Sep;70(9):934-40. doi: 10.1136/jech-2015-206502. Epub 2016 May 13. PMID: 27177581; PMCID: PMC5013153.

⁴⁹Slade GD, Grider WB, Maas WR, Sanders AE. Water Fluoridation and Dental Caries in U.S. Children and Adolescents. J Dent Res. 2018 Sep;97(10):1122-1128. doi: 10.1177/0022034518774331. Epub 2018 Jun 14. PMID: 29900806; PMCID: PMC6169031.

⁵⁰Meyer J, Margaritis V, Mendelsohn A. Consequences of community water fluoridation cessation for Medicaid-eligible children and adolescents in Juneau, Alaska. BMC Oral Health. 2018 Dec 13;18(1):215. doi: 10.1186/s12903-018-0684-2. PMID: 30545358; PMCID: PMC6293551.

⁵¹Do L, Ha D, Peres MA, Skinner J, Byun R, Spencer AJ. Effectiveness of water fluoridation in the prevention of dental caries across adult age groups. Community Dent Oral Epidemiol. 2017 Jun;45(3):225-232. doi: 10.1111/cdoe.12280. Epub 2017 Jan 16. PMID: 28092105.

⁵²Chankanka O, Marshall TA, Levy SM, Cavanaugh JE, Warren JJ, Broffitt B, Kolker JL. Mixed dentition cavitated caries incidence and dietary intake frequencies. Pediatr Dent. 2011 May-Jun;33(3):233-40. PMID: 21703076; PM-CID: PMC3690298.

⁵³Chankanka O, Levy SM, Marshall TA, Cavanaugh JE, Warren JJ, Broffitt B, Kolker JL. The associations between dietary intakes from 36 to 60 months of age and primary dentition non-cavitated caries and cavitated caries. J Public Health Dent. 2015 Fall;75(4):265-73. doi: 10.1111/j.1752-7325.2012.00376.x. Epub

⁵⁴Choo-Wosoba H, Gaskins J, Levy S, Datta S. A Bayesian approach for analyzing zero-inflated clustered count data with dispersion. Stat Med. 2018 Feb 28;37(5):801-812. doi: 10.1002/sim.7541. Epub 2017 Nov 6. PMID: 29108124; PMCID: PMC5799048.

⁵⁵Achievements in Public Health, 1900-1999: Fluoridation of Drinking Water to Prevent Dental Caries. MMWR, 48(41); 933-940, October 22, 1999

⁵⁶Limeback H, A re-examination of the pre-eruptive and post-eruptive mechanism of the anti-caries effects of fluoride: is there any anti-caries benefit from swallowing fluoride? Community Dentistry and Oral Epidemiology, First Published 14 February 2007 https://doi.org/10.1111/j.1600-0528.1999.tb01993.x Volume27, Issue1 February 1999 Pages 62-71

V. RISKS: COST OF DENTAL FLUOROSIS (See also Endnote References)

"estimated costs for restoring function exceeds the cosmetic costs"

WHO reports, "In acute poisoning, fluoride kills by blocking normal cellular metabolism. Fluoride inhibits enzymes, in particular metalloenzymes involved in essential processes, causing vital functions such as the initiation and transmission of nerve impulses, to cease. Interference with necessary bodily functions controlled by calcium may be even more important." Assuming fluoride has a threshold for everyone which is safe is presumptive.

Researchers have indicated water fluoridation is a crude and rather ineffective policy to prevent dental caries without a detectable threshold for dental damage. (Dong and European Commission, 2011) A detectible threshold of fluoride exposure for dental damage is possible and critical for the policy of fluoridation. Although the odds of developing dental fluorosis increased with increased water fluoride concentration, the potential for harm exists at all water fluoride concentrations and unique for different individuals.

Gu⁵⁸ (2020" "The pathogenesis of dental fluorosis is not totally clear, which may be a complex pathological process involving both genetic and environmental factors. The prevalence of dental fluorosis has an upward trend around the world, thus certain public prevention and treatment strategies need to be taken."

Jarquín-Yñezá⁵⁹ (2018) "Conclusions: An association of rs 412777 polymorphism in the COL1A2 gene with dental fluorosis was found. Therefore, genetic variants represent a relevant risk factor to develop dental fluorosis, as it was proven in this study conducted in Mexican children."

⁵⁷ Environmental Health Criteria 36, Fluorine and Fluorides, p. 52, 1984

⁵⁸ Gu LS, Wei X, Ling JQ. [Etiology, diagnosis, prevention and treatment of dental fluorosis]. Zhonghua Kou Qiang Yi Xue Za Zhi. 2020 May 9;55(5):296-301. Chinese. doi: 10.3760/cma.j.cn112144-20200317-00156. PMID: 32392970

⁵⁹ Jarquín-Yñezá L, Alegría-Torres JA, Castillo CG, de Jesús Mejía-Saavedra J. Dental fluorosis and a polymorphism in the COL1A2 gene in Mexican children. Arch Oral Biol. 2018 Dec;96:21-25. doi: 10.1016/j.archoralbio.2018.08.010. Epub 2018 Aug 23. PMID: 30172079.

Suzuki⁶⁰ (2015) We demonstrate that fluoride exposure generates reactive oxygen species (ROS) and the resulting oxidative damage is counteracted by SIRT1/autophagy induction through c-Jun N-terminal kinase (JNK) signaling in ameloblasts. In the mouse-ameloblast-derived cell line LS8, fluoride induced ROS, mitochondrial damage including cytochrome-c release, up-regulation of UCP2, attenuation of ATP synthesis, and H2AX phosphorylation (γ H2AX), which is a marker of DNA damage."

Dental fluorosis is usually considered the singular causation, a biomarker, of excess fluoride ingestion prior to 6-8 years of age; however, other unknowns need to be explored⁶¹ to explain the significant increase in dental fluorosis.

DENTAL FLUOROSIS IS BOTH COSMETIC AND FUNCTIONAL

Collins. 62 (1987) "A mean cost for all consultants shows that the estimated costs for restoring function exceeds the cosmetic costs in all categories except the minimum later costs. This represents a new finding and raises an issue that has been overlooked or ignored by previous investigators and the profession. i.e... that repair of the cosmetic discoloration was the only cost involved; or that repair of dysfunction was never considered to be a problem." (Emphasis supplied)

Collins study was funded by the EPA for the EPA and peer reviewed by the EPA to evaluate the cost of fluoride exposure from water at four concentrations. The six consultants do not appear to be blinded, they were chosen from locations with various fluoride concentrations. and do not appear to have been cosmetic dentists. Perhaps the consultants were functional dentists rather than cosmetic dentists and their focus was on functional restorations. Regardless, dental fluorosis is both cosmetic and functional damage.

⁶⁰ Suzuki M, Bandoski C, Bartlett JD. Fluoride induces oxidative damage and SIRT1/autophagy through ROS-mediated JNK signaling. Free Radic Biol Med. 2015 Dec;89:369-78. doi: 10.1016/j.freeradbiomed.2015.08.015. Epub 2015 Sep 30. PMID: 26431905; PMCID: PMC4684823.

⁶¹ Akpata ES. Occurrence and management of dental fluorosis. Int Dent J. 2001 Oct;51(5):325-33. doi: 10.1002/j.1875-595x.2001.tb00845.x. PMID: 11697585.

⁶²Collins, E., V. Segreto, H. Martin, AND H. Dickson. ANALYSIS OF COSTS FOR THE TREATMENT OF DENTAL FLUOROSIS. U.S. Environmental Protection Agency, Washington, D.C., EPA/600/5-87/001 (NTIS PB87170817), 1987.

"Damage is the cost, not the repair." Without patient consent, compensation for damage with quality treatment costs is reasonable. Harm from fluoridation is not self inflicted harm or patient negligence.

The picture of severe fluorosis to the right is of my patient growing up on fluoridated bottled "Nursery Water" (DS Waters of America Inc. <1 ppm) starting at age 4 months. Mom is confident he did not use fluoride toothpaste until



about age 4 years old and did not swallow toothpaste. Estimated exposure is less than 1 mg per day when young to about 1 mg at age 4. Dosage estimated at 0.13+ mg/kg/day when 4 months old to 0.05+ mg/kg/day at 4 years. An increase in fluoride exposure when fluoridated toothpaste started would be expected. This severe dental fluorosis damage is known harm from excess fluoride primarily from water below fluoridation concentrations recommended by WHO.

The Nuffield Council suggests the risks for a public health policy should be judged on "**potential harm**," more protective than "possible, presumed, or known harm."

WHO accepts the known harm calling it an "adverse effect," yet, minimizes the harm. "However, fluoride can also have an adverse effect on tooth enamel and may give rise to mild dental fluorosis (prevalence: 12–33%) at drinking-water concentrations between 0.9 and 1.2 mg/l, depending on drinking-water intake and exposure to fluoride from other sources."

WHO falls into the trap of protecting fluoridation by attempting to isolate the exposure of fluoride from total fluoride exposure. Real world life is not lived in isolation and Public Health must NOT ignore total fluoride exposure from all sources and patient sensitivities.

Akpata⁶³ reports, *In some countries, exposure to apparently low fluoride concentrations in drinking water has resulted in severe dental fluorosis in some children.*

⁶³ Akpata ES. Occurrence and management of dental fluorosis. Int Dent J. 2001 Oct;51(5):325-33. doi: 10.1002/j.1875-595x.2001.tb00845.x. PMID: 11697585.

In contrast, the US Centers for Disease Control and Prevention (CDC)⁶⁴ and Community Preventive Task Force⁶⁵ report no harm from fluoridation except dental fluorosis and only cosmetic, usually only noticed by trained professionals, and other sources of fluoride are not significant.

PERCENTAGE OF THE POPULATION HARMED WITH DENTAL FLUOROSIS

Cosmetic dentistry is subjective and dependent on the dentists opinion, presentation of cosmetic health, their skill, training, materials available, socioeconomics of their patient base and each individual patient's subjective opinion.

In 1993, Riordan⁶⁶ reported 17.5% of 7 year olds who do not have all their adult teeth were assessed by members of the public as a notable concern of dental fluorosis. Functional damage was not included. With dental fluorosis about twice as high now as 1993, and currently NHANES twice reporting 70% of children with dental fluorosis, a conservative estimation of 17.5% of children have **notable concern and functional damage** is reasonable which would include a percentage of those with mild dental fluorosis and most with moderate and severe fluorosis.

Moderate and severe fluorosis appears to range from 3.6% (Beltran-Aguilar ages 12-15 years in 1999-2004) 6% (Ko) to 28% (NHANES 2012).

An estimated range of 4% to 17.5% of those fluoridated have cosmetic concern and/or functional damage contributed by fluoridation.

DENTAL FLUOROSIS TREATMENT OPTIONS

Treatment options today are potentially different than in the 1980's Collins' study which reported a range between \$660 to \$12,000 (2019 dollars corrected by 2.2 for inflation). Collins made an assumption a needed treatment would last a lifetime. Because more functional damage was noted in Collins study than cosmetic damage, the possibility the consultants put a higher treatment

⁶⁴ https://www.cdc.gov/fluoridation/faqs/community-water-fluoridation.html accessed May 17, 2022

⁶⁵ Community Preventive Services Task Force; https://www.thecommunityguide.org/sites/default/files/assets/Oral-Health-Caries-Community-Water-Fluoridation.pdf 2015 Accessed May 17, 2022

⁶⁶Riordan PJ. Perceptions of Dental Fluorosis. *Journal of Dental Research*. 1993;72(9):1268-1274. doi:10.1177/00220345930720090201

priority on functional harm than cosmetic harm must be considered. Damage is measured here by the cost of quality treatment rather than dental insurance covered procedures.

While practicing in a low socioeconomic community, I almost never treated cosmetic issues. Moving to a high socioeconomic community I frequently treat cosmetic concerns. When people have money, cosmetics becomes a greater concern and dentists tend to diagnose what their patients can afford or is covered by their insurance. There is no wonder why Delta Dental funds fluoridation when they assume benefit and do not cover cosmetic damage.



Micro-abrasion,⁶⁷ grinding away the outer layer of enamel, can improve superficial defects of dental fluorosis. Treatment estimated \$500 to \$2,500 per patient life time and may need additional vital bleaching. Some patients consider micro-abrasion additional damage, but certainly less than a typical crown or veneer.

Bleaching is more acceptable to some but tends to whiten all areas and a contrast in shade is, for some, not fully restored. Bleaching needs to be retreated and an estimate is \$100 to \$600 every 2 years. We use an estimated \$100 PPPY (per person per year) for 60 years, \$6,000 life time

⁶⁷ Azzahim L, Chala S, Abdallaoui F. La micro-abrasion amélaire associée à l'éclaircissement externe: intérêt dans la prise en charge de la fluorose [Role of enamel microabrasion associated with external bleaching in the management of patients with dental fluorosis]. Pan Afr Med J. 2019 Oct 4;34:72. French. doi: 10.11604/pamj.2019.34.72.20401. PMID: 31819788; PMCID: PMC6884726.

treatment costs. Statista survey⁶⁸ reports 37 million in the USA had bleaching in 2020, about 14% of the age range of dental fluorosis.

Placing a value on the damage for patient perceived damage, assumed to be mostly in moderate to severe fluorosis found objectionable with high quality cosmetic and functional treatment is estimated at \$1,000 to \$2,500 per tooth, \$1,200 is used here. The diagnosis of dental fluorosis is based on the two worst teeth, although 1 to 28 teeth can be damaged. If costs are not the controlling factor, a cosmetic patient will want several or all upper and lower teeth treated. An estimate of an average of 10 teeth at \$1,200 per tooth damage both functional and cosmetic is at the high end of Collins EPA study and in keeping with high quality cosmetic restorative treatment. For a lifetime cost, the work is estimated to be replaced an average of every 12 years, or \$1,000 PPPY, 60 year lifetime of \$60,000 damage. Damage is determined by cost of damage.

Assuming 4% to 17.5%% of the population have fluorosis of noticeable and functional harm which they would choose to be compensated for (\$2,400-\$10,500), and 1.46% at each year of life, an average per capita harm to teeth from excess fluoride exposure is \$35 to \$153 PPPY harm to teeth compared to \$6 PPPY benefit to teeth.

From just an evaluation of dental benefit cost analysis, fluoridation does not make sense.

An example of high quality dental fluorosis treatment (not my patient):

⁶⁸ https://www.statista.com/statistics/287384/usage-of-tooth-whiteners-in-the-us-trend/

VI. COST OF FLUOROSIS DAMAGE (See also Endnote References)

"The principle hazard at issue from exposure to fluoridation chemicals is IQ loss.69"

Several streams of evidence should be kept in mind. Fluoride concentrations in water are not individual total exposure because not everyone drinks the same amount of water, some drink 10 times more than the mean, and some ingest more from other sources such as swallowing tooth-paste. Genetic factors need inclusion. An uncertainty factor should be included and a range of total exposure of at least 10 should be used. Pregnant moms are of particular concern because the placenta does not significantly protect the developing fetus from fluoride.

Whereas the mechanism for potential benefit from swallowing fluoride is not well understood, the mechanism of fluoride's developmental neurotoxicity has been reported. "NaF induces developmental neurotoxicity by decreasing lysosomal V-ATPase expression, increasing lysosomal pH, disrupting lysosomal degradation capacity, and blocking autophagic flux, induced neurotoxicity."⁷⁰

Over 70 human IQ studies have reported developmental neurotoxicity from fluoride. Most studies prior to 2015 were ecological in design as opposed to individual level exposure and most not reasonably applicable to fluoridation concentrations. Since 2015, high-quality USA government funded studies included measurements at the individual level, at fluoridation concentrations 0.7 mg/L fluoride or less and report harm.

Twenty seven of the IQ studies published between 1988-2012 were used in a meta-analysis by a Harvard University team including Philippe Grandjean (Choi et al 2012). The consistent results from several countries found lower IQ in the "high-fluoride" villages compared with the low-fluoride villages, averaging 7 IQ points lower. Most were at levels above 0.7 mg/l.

⁶⁹Bruce Lamphear MD MPH Professor of Health Sciences at Simon Fraser University. Authored the seminal research on the neurotoxicity of lead.

⁷⁰Han X, Tang Y, Zhang J, Hu Z, Xu W, Xu S, Niu Q, Impaired V-ATPase leads to increased lysosomal pH, results in disrupted lysosomal degradation and autophagic flux blockage, contributes to fluoride-induced developmental neurotoxicity, Ecotoxicology and Environmental Safety, Accepted 6 April 2022 www.elsevier.com/lo-cate/ecoenv https://doi.org/10.1016/j.ecoenv.2022.113500

Some may suggest the findings are irrelevant to fluoridation programs at 0.7 mg/L; however, potential harm to some or many should consider: (a.) the individual amount of water ingested, (b) total fluoride exposure, (c) patient sensitivity, (d) nutritional status (e) other toxicants such as arsenic, (f) and lack of uncertainty factor.

The NTP's systematic review of fluoride's neurotoxicity (2016-2022).

The US National Toxicology Program (NTP) Draft Monograph on the Systematic Review of Fluoride Exposure and Neurodevelopmental and Cognitive Health Effects⁷¹ concludes fluoride is presumed to have a developmental neurotoxic effect on the developing brain, resulting in lower IQ. "Presumed" determination is stronger confidence than Nuffield's "potential harm." "Fluoride is presumed to be a cognitive neurodevelopmental hazard to humans is based on consistent evidence from 26 lower risk-of-bias studies that evaluated fluoride exposure and effects on children's IQ and other cognitive effects."⁷²

The National Academy of Science (NAS) did a peer review of the NTP draft but "did not conduct its own independent evaluation of the evidence, and it did not conduct a data audit," nor was the review blinded. The NAS did not refute the conclusion, in part because the NTP did not conduct a formal dose-response assessment. NTP did not evaluate benefit, only developmental neurotoxicity.

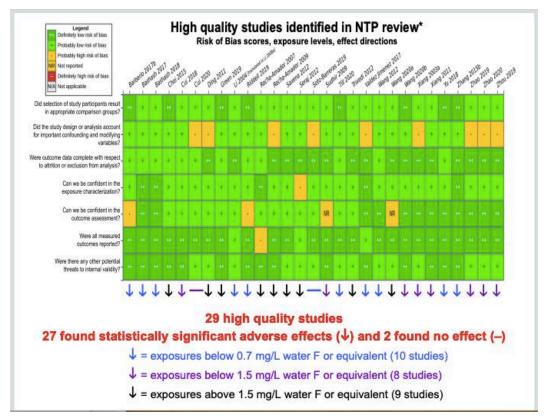
The NAS draft concluded, "the committee does not find that NTP has adequately supported its conclusion. That finding does not mean that the conclusion is incorrect; rather, further analysis or reanalysis as noted in the present report is needed to support conclusions in the monograph."

The NTP has published two drafts of its review of fluoride's neurotoxicity, (NTP,2019, NTP,2020).

The draft versions have indicated that of 29 High Quality (i.e. low risk of bias), 27 found a lowering of IQ and only 2 found no effect. Of these 27, 10 were conducted at 0.7 ppm or lower; another 8 conducted between 0.7 and 1.5 ppm and 9 at 1.5 ppm or higher (ISEE-2020 poster).

⁷¹https://www.asdwa.org/wp-content/uploads/2019/10/draft fluoride monograph 20190906 5081.pdf

⁷²DRAFT NTP MONOGRAPH ON THE SYSTEMATIC REVIEW OF FLUORIDE EXPOSURE AND NEURODEVELOPMENTAL AND COGNITIVE HEALTH EFFECTS p. 72. https://fluoridealert.org/wp-content/uploads/ntp.revised-monograph.9-16-2020.pdf



The top of the half of this figure is the NTP's summary of the quality (risk of bias) ratings given by the NTP for 29 studies. The color code ranges from green to red, where green represents low risk of bias (i.e. high-quality) and red means high risk of bias (i.e. low-quality). The lower part of the figure has been added by Chris Neurath, FAN's research director, who has identified the water fluoridation measured in each study (see ISEE-2020 poster).

The finding of lowering IQ at 1.5 ppm offers no adequate margin of safety when you are exposing a large population of children to 0.7 ppm of fluoride in their drinking water. There are two reasons for this a) children drink different amounts of water and b) there is a wide range of sensitivity to any toxic substance among a large population. Typically, regulatory agencies like the EPA would like a margin of safety of 10, in this case 1.5 ppm only offers a margin of safety of 2.

Three benchmark dose analysis have been done for fluoride's developmental neurotoxicity, with consistent results.

Hirzy (2016) reported 1 IQ loss at 0.22 mg/L fluoride in water.

Grandjean (2021)⁷³ 1 IQ loss at 0.2 mg/L fluoride in urine or water. "Thus, the joint data show a BMCL in terms of the adjusted U-F (urine fluoride) concentrations in the pregnant women of approximately 0.2 mg/L. These results can be used to guide decisions on preventing excess fluoride exposure in pregnant women."

The third by Thiessen⁷⁴ for the TSCA ongoing trial against the EPA.

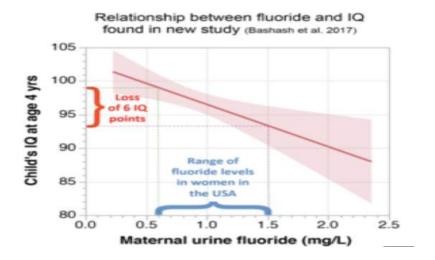
Table 6 of the NTP 2020 draft report lists only three studies from the year 2020, Wang, Cui, and Till, no studies from 2021 or 2022. The potential that additional studies will contradict the combined strength of current studies reporting harm is highly unlikely.

Three studies to consider based on individual measurements of fluoride exposure (<u>Bashash et al.</u>, <u>2017</u>) published in *Environmental Health Perspectives*, then <u>Green et al.</u>, <u>2019</u> published in JAMA Pediatrics and <u>Till et al.</u>, <u>2020</u>) in *Environment International*. They controlled for confounding variables and were conducted either in fluoridated communities at 0.7 ppm (Green, 2019 and Till, 2020) or in communities with exposures (from other sources) in the same range as fluoridated communities (Bashash, 2017 and 2018).

Bashash, et al. 2017, a 12-year, prospective mother-child cohort study reported a 4 to 5 point loss of IQ in offspring, associated with maternal fluoride intake, typical of a fluoridated community. The mother's fluoride exposure was measured directly via urinary fluoride level and the paired offspring's IQ was measured (again individually) at 4 and 6-12 years of age. Measured urinary fluoride concentration evaluates total fluoride exposure regardless of the source. Graphing the Bashash 2017 data below.

⁷³Grandjean P, Hu H, Till C, Green R, Bashash M, Flora D, Tellez-Rojo MM, Song PXK, Lanphear B, Budtz-Jørgensen E. A Benchmark Dose Analysis for Maternal Pregnancy Urine-Fluoride and IQ in Children. Risk Anal. 2021 Jun 8. doi: 10.1111/risa.13767. Epub ahead of print. PMID: 34101876.

⁷⁴Kathleen Thiessen Ph.D Director and senior scientist at Oak Ridge Center for Risk Analysis. Served on the 2006 National Research Council panel that reviewed the toxicologic literature on fluoride.



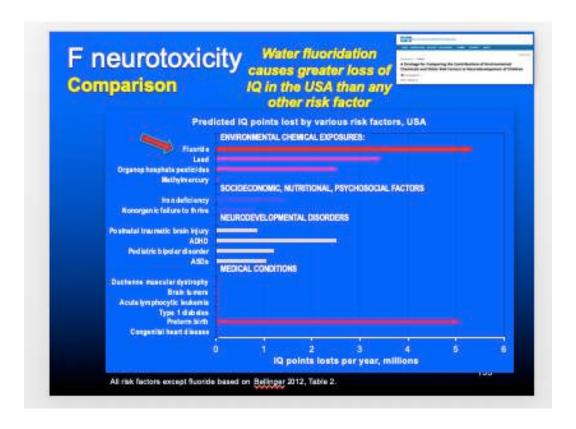
(Graph by Connett and Neurath)

Till et al, 2018. again measured the urine fluoride levels in pregnant women across Canada and reported the urine fluoride levels were twice as high in fluoridated communities as in non-fluoridated communities. Till et al reported the average levels in the fluoridated communities were similar to the levels found by Bashash, i.e. 0.91 versus 0.87 ppm.

Green et al., 2019 published in *JAMA Pediatrics* essentially replicated the Bashash, 2017 findings IQ lower in boys associated with maternal fluoride exposure but not in girls. Using two other ways of assessing maternal fluoride exposure they reported IQ low for boys and girls.

A podcast (LINK) by two of the *JAMA Pediatrics* editors is short and well worth watching. The editors also published in the same issue of the journal an editorial explaining this and an article from Dr. David Bellinger.

Till et al., 2020. showed that early infancy is another vulnerable period from fluoride for the developing brain. Till found a large significant lowering of IQ (i.e. up to 9 IQ points) for children who were bottle-fed in *fluoridated communities* in Canada (F level = 0.7 ppm or less) compared to those who were bottle-fed in *non-fluoridated communities*.



This figure is based on data collected by David Bellinger (<u>Bellinger, 2012</u>, Table 2) only the fluoride data line has been added. Figure by Chris Neurath (<u>ISEE-2020</u> poster)

Gram for gram, based on our current understanding, fluoride is not more neurotoxic than lead. Lead levels and IQ loss is measured in parts per *billion* fluoride and IQ loss is measured in parts per *million*. However, millions of people every day in the USA is leading to a greater overall loss of IQ points at the population level.

Studies reporting no IQ concerns.

Broadbent et al. (2015) The draft versions of the systematic review by the NTP gave this study a low-quality rating (a high risk of bias). Osmunson⁷⁵ reported the study had little power to find a difference in IQ between the children who drank fluoridated water and those who didn't. There were nearly 1000 children who grew up in a fluoridated area but less than 100 who did not. Only fluoride via water was measured and not via tea, toothpaste or via supplements which are seldom prescribed to those on fluoridated water; therefore, most supplements would have been pre-

⁷⁵Osmunson, B., Limeback, H., & Neurath, C. (2016). Study Incapable Of Detecting IQ Loss From Fluoride. *American journal of public health*, *106*(2), 212–213. https://doi.org/10.2105/AJPH.2015.302918

scribed in the non fluoridated 100 children. Exposure during fetal and infant development were not measured.

Aggeborn and Öhman (2016). The Effects of Fluoride In The Drinking Water. looked at populations by region in Sweden and used the average naturally occurring fluoride level because Sweden is not artificially fluoridated. The authors considered population measurements for cognitive ability and achievement. Individual measurements of fluoride exposure were not made. Dr. Vyvyan Howard, an infant and fetal pathologist, "Anybody who accepts that this paper trumps Bashash and/or Green can't have read any of the studies very thoroughly - or has an agenda."

Guth et al. 2020 and 2021 incorrectly give more weight to the Broadbent study than to the Green study with individual measured fluoride concentrations.

Miranda et al., 2021 only considered studies of children aged 8-12. (See https://www.qeios.-com/read/X3MKH8).

<u>Ibarluzea et al., 2022</u>. This prospective cohort study from Spain is an outlier. They did *not* find a loss of IQ in the fluoridated community compared to the non-fluoridated community, rather they found a *15 IQ point benefit* for boys. Ibarluzea et al appears to have failed to adequately control for other toxins such as for lead and arsenic in the industrial non-fluoridated community.

TOXIC SUBSTANCE CONTROL ACT LEGAL ACTION

In 2017, the EPA was taken to Federal court (Region 9, San Francisco). Experts for the plaintiffs were Howard Hu (director of the ELEMENT cohort in Mexico City which was used in the Bashash, 2017 and 2018 studies); Bruce Lanphear, a world-renowned expert on lead's neurotoxicity and co-author of the Green, 2019 and Till, 2021 studies and Philippe Grandjean, a world-renowned expert on mercury's neurotoxicity and author of <u>a risk assessment (BMD analysis)</u> on fluoride's neurotoxicity.

EPA used Exponent, Inc. experts. The EPA lawyers chose not to use scientists from within the agency, but instead used experts from the firm *Exponent, Inc.* This firm is well known for being highly industry-friendly defending the safety of such chemicals as dioxins, PCBs, PFOS and Monsanto's glyphosate. The Exponent's experts agreed the four US government-funded studies (Bashash, 2017, 2018; Green, 2019 and Till, 2020) are the highest quality human studies on fluoride conducted to date.

Hu, "Fluoride is a developmental neurotoxicant at levels of exposure seen in the general population in water-fluoridated communities."

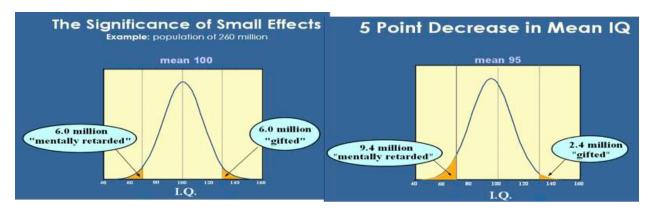
Grandjean⁷⁶ "IQ losses associated with community water fluoridation are substantial and of significant public health concern."

Lamphear⁷⁷ "Fluoride exposure during early brain development diminishes the intellectual abilities in young children."

Estimating the cost of lower IQ depends in part on what is included in lower IQ. Research indicates we can expect more than 50% increase in special education students, half as many gifted, increase in incarceration, increase in divorce, increase in job loss and less job retention. Higher IQ is also associated with increased happiness.

For more human studies reporting fluoride's developmental neurotoxicity, see https://fluorideal-ert.org/studies/brain01/ where a review of studies which do not report an association between fluoride and IQ can be found.

Graphing the effect of 5 IQ loss on the population below raises serious concern.



(Illustration used by Physicians for Social Responsibility and effects of lead)

⁷⁶Phillipe Grandjean MD DMSc Chair of Environmental Medicine at the University of Southern Denmark. Nearly 500 papers published, specialized in developmental exposures to environmental chemicals like mercury, fluoride, and lead.

⁷⁷Bruce Lamphear MD MPH Professor of Health Sciences at Simon Fraser University.

In addition, blood lead levels in fluoridated communities are twice as high for whites and six times higher for African Americans.⁷⁸, ⁷⁹, ⁸⁰

There is an incredible correlation between IQ and income. Various reports find homeless mean IQ of 80, average American welfare recipient IQ 92, millionaires IQ 118 and billionaires 130.81 However there is not a direct correlation between dollars and IQ. For example, some professions such as University Professors, Judges, and Humanitarian agency employees often have very high IQ but chose the betterment of society rather their own financial benefit.

We are just beginning to determine what dimension of IQ is harmed the most with fluoride ingestion. "According to professor Howard Gardner of Harvard University, intelligence can be measured along seven different dimensions: Visual-spatial, bodily-kinesthetic, musical, social, emotional, linguistic, and logical-mathematical. At most, an IQ test tries to measure three of these: Visual-spatial, linguistic, and logical-mathematical. Some people see even more dimensions — creativity, memory and retention, reaction time, etc."

As scientists test fluoride's neurotoxic effects in more specific ages, races, genders, nutrients, diseases, medications, and various intelligence dimensions, we will have a more clear and elevated confidence on precisely how much and what aspects of the human brain and nervous system is being harmed.

There will always be some who in effect require RCTs of harm to prove damage. However, an ethical approach only requires our confidence to be at a potential of harm.

⁷⁸Coplan MJ, Patch SC, Masters RD, Bachman MS. Confirmation of and explanations for elevated blood lead and other disorders in children exposed to water disinfection and fluoridation chemicals. Neurotoxicology. 2007 Sep;28(5):1032-42. doi: 10.1016/j.neuro.2007.02.012. Epub 2007 Mar 1. PMID: 17420053.

⁷⁹Maas RP, Patch SC, Christian AM, Coplan MJ. Effects of fluoridation and disinfection agent combinations on lead leaching from leaded-brass parts. Neurotoxicology. 2007 Sep;28(5):1023-31. doi: 10.1016/j.neuro.2007.06.006. Epub 2007 Jun 30. PMID: 17697714.

⁸⁰Masters RD, Coplan MJ, Hone BT, Dykes JE. Association of silicofluoride treated water with elevated blood lead. Neurotoxicology. 2000 Dec;21(6):1091-100. PMID: 11233755.

⁸¹ https://pumpkinperson.com/2016/02/11/the-incredible-correlation-between-iq-income/

Muir⁸² (2001) estimated 5 IQ loss in the USA of \$275 and \$326 Billion per year or \$980 to \$1,160 PPPY in 2001 and correcting 2.2 for 2010 dollars is \$2,156 to \$2,552PPPY

The highest estimate of fluoridation's benefit is lost when including cosmetic and functional harm and presumed developmental neurotoxic effects are more confident than a judgment of potential harm.

Attempting to measure harm to the brain with money, fails to include the emotional harm and grief for the patient, their families and friends.

⁸²Muir T, Zegarac M., Societal Costs of Exposure to Toxic Substances: Economic and Health Costs of Four Case Studies That Are Candidates for Environmental Causation. Environmental Health Perspectives Volume 109 Supplement 6. December 2001.

VII. RISK: POTENTIAL ADHD INCREASE.

Attention Deficit Hyperactivity Disorder (ADHD) has become one of the most commonly diagnosed childhood behavioral disorders. Its basic characteristics are inattention, hyperactivity and impulsivity. "ADHD often continues into adolescence and adulthood, which can lead to medication dependency and a lifetime of treatment (Maddox et al.YEAR)"

Malin and Till examined the relationship between exposure to fluoridated water and ADHD prevalence among children and adolescents, ages 4-17, in the United States. The authors found that, the percentage of each state fluoridated as assessed in 1992, "significantly positively predicted state prevalence of ADHD in 2003, 2007 and 2011, even after controlling for socioeconomic status."

A multivariate regression analysis showed that after socioeconomic status was controlled each 1% increase in artificial fluoridation prevalence in 1992 was associated with approximately 67,000 to 131,000 additional ADHD diagnoses from 2003 to 2011. Overall state water fluoridation prevalence (not distinguishing between fluoridation types) was also significantly positively correlated with state prevalence of ADHD for all but one year examined." (Malin & Till, 2015). See figure below

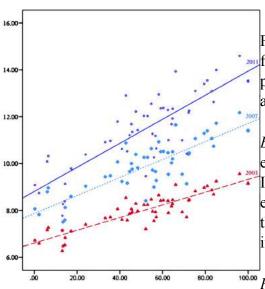


Figure 12: Percent of children with ADHD (by state) for 2003, 2007 and 2011 plotted against the % of the population in each state fluoridated in 1992 (Mallin and Till, 2015)

Bashash et al., 2018 using the same ELEMENT mother-child cohort in Mexico City that they used in their IQ study (Bashash et al, 2017) found that as the mothers' exposure to fluoride increased (as measured in their urine) so did the number of symptoms of ADHD increase in their offspring

Riddell, et al. 2019. Reported 284% increase in the prevalence of ADHD among adolescents in fluoridated

communities in Canada compared to non-fluoridated communities.

ADHD appears to have different phases and life long effect.83

⁸³Brod, M., Schmitt, E., Goodwin, M. et al. ADHD burden of illness in older adults: a life course perspective. Qual Life Res **21**, 795–799 (2012). https://doi.org/10.1007/s11136-011-9981-9

CDC⁸⁴ 2016 reported National Prevalence of ADHD at 6.1% children 2-17. That reduces 4.5% of the total population are on fluoridated water. We estimate half or 2.25% of the ADHD is from fluoridation.

Miller⁸⁵ estimated excess ADHD costs from \$143 to \$266 Billion per year, we use 2.25% of 180 Billion resulting in \$4 Billion per year, 60 year lifespan, for \$240 Billion ADHD lifetime harm from fluoridation. For every dollar saved with fluoridation, ADHD costs increase by \$1,700. However, some of these costs would overlap with costs for lower IQ.

⁸⁴Danielson M, Bitsko R, Ghandour RM, Holbrook J, Kogan,M, Prevalence of Parent-Reported ADHD Diagnosis and Associated Treatment among U.S. Children and Adolescents, 2016.. Journal of Clinical Child and Adolescent Psychology. Published online before print January 24, 2018

⁸⁵Miller C, Study Finds Substantial Economic Impact of ADHD in the United States. American Psychiatric Association Foundation, November 2016.

VIII. RISK: ENDOCRINE AND HORMONE DISRUPTION (See also endnotes)

"Endocrine systems, also referred to as hormone systems, are found in all mammals, birds, fish, and many other types of living organisms. They are made up of:

- -Glands located throughout the body;
- -Hormones that are made by the glands and released into the bloodstream or the fluid surrounding cells; and
- -Receptors in various organs and tissues that recognize and respond to the hormones."86, 87

Hormones regulate many biological processes and regulate blood sugar, growth, , reproductive organs, metabolism, sex hormones, development of the brain, and nervous system, testes, ovaries, pituitary, thyroid and adrenal glands.

The National Research Council (NRC, 2006) panel devoted a whole chapter to a discussion of fluoride and the endocrine system.

The panel concluded that fluoride was an <u>endocrine disruptor</u>. The authors state:

"The chief endocrine effects of fluoride exposures in experimental animals and in humans include decreased thyroid function, increased calcitonin activity, increased parathyroid hormone activity, secondary hyperparathyroidism, impaired glucose intolerance, and possible effects on the timing of sexual maturity. Some of these effects are associated with fluoride intake that is achievable at fluoride concentrations in drinking water of 4 mg/L or less, especially for young children or for individuals with high water intake. (p. 8, NRC 2006)

"In summary, evidence of several types indicates that fluoride affects normal endocrine function or response; the effects of the fluoride-induced changes vary in degree and kind in different individuals. Fluoride is therefore an endocrine disruptor in the broad sense of altering normal endocrine function or response, although probably not in the sense of mimicking a normal hormone." (p. 266, NRC 2006)

⁸⁶https://www.epa.gov/endocrine-disruption/what-endocrine-system#hormones

⁸⁷United States Environmental Protection Agency, What is the Endocrine System? https://www.epa.gov/endocrine-disruption/what-endocrine-system#hormones

Endocrine damage is a serious concern. Endocrine disruption can cause developmental malformations, reproductive harm, increased cancer risk, disturbances in the immune and nervous system function.

Cost of Endocrine disruption from fluoride. Attina⁸⁸ (2016) estimated the economic burden due to the health effects of endocrine-disrupting chemicals at \$340 Billion which maybe low. Estimating how much damage is caused by each specific endocrine disrupting chemical has not been published. The amount of damage from fluoride exposure is not know and probably overlap with lower IQ and ADHD.

Liang⁸⁹ "These results revealed that fluoride could induce mitochondrial impairment and excessive PINK1/Parkin-mediated mitophagy in testicular cells, especially in Leydig cells, which could contribute to the elucidation of the mechanisms of F-induced male reproductive toxicity."

Attina TM Hauser R Sathyanarayana S et al. Exposure to endocrine-disrupting chemicals in the USA: a population-based disease burden and cost analysis. Lancet Diabetes Endocrinol. 2016; 4: 996-1003

⁸⁹Liang C, Gao Y, He Y, Han Y, Manthari RK, Tikka C, Chen C, Wang J, Zhang J. Fluoride induced mitochondrial impairment and PINK1-mediated mitophagy in Leydig cells of mice: In vivo and in vitro studies. Environ Pollut. 2020 Jan;256:113438. doi: 10.1016/j.envpol.2019.113438. Epub 2019 Oct 21. PMID: 31672359.

IX. RISK: POTENTIAL FOR THYROID HARM (See also endnotes)

In 2006, the NRC panel reported: "Fluoride exposure in humans is associated with elevated TSH concentrations, increased goiter prevalence, and altered T4 and T3 concentrations; similar effects in T4 and T3 are reported in experimental animals, but TSH has not been measured in most studies." (p. 262) An elevated TSH level is an indicator of low thyroid function.

The NRC panel also indicated that effects on the thyroid have been observed at very low levels. They state that, "In humans, effects on thyroid function were associated with fluoride exposures of 0.05-0.13 mg/kg/day when iodine intake was adequate and 0.01-0.03 mg/kg/day when iodine intake was inadequate (Table 8-2)." (p. 263, NRC 2006).

Hypothyroid and fluoride study from UK. These concerns were further reinforced by new research conducted in the UK and published in 2015 by Peckham et al.⁹⁰

Peckham et al. used the records of over 98% of the General practices in England on the numbers of patients treated for hypothyroidism and examined the prevalence of this condition as a function of the fluoride levels in the local drinking water supplies. The authors noted that:

"Approximately, six million people (10%) in England live in areas where drinking water contains natural fluoride or which has been artificially fluoridated at a target concentration of 1 ppm (1 mg/L). Using prevalence data from the UK QOF, an analysis was undertaken to determine whether prevalence was affected by practice populations being situated in fluoridated areas at >0.7 mg/L and areas with lower levels of fluoride. While there are other sources of fluoride in people's diet (eg, tea), drinking water is the most significant source of ingested fluorides in the UK." (Peckham et al, 2015)

The UK research team found that higher levels of fluoride in drinking water was a useful predictor of the prevalence of hypothyroidism. They found that general medical practices located in the West Midlands (a wholly fluoridated area) are nearly twice as likely to report high hypothyroidism prevalence in comparison to Greater Manchester (non-fluoridated area). (Peckham et al, 2015)

Peckham et al, concluded:

"In many areas of the world, hypothyroidism is a major health concern and in addition to other factors—such as iodine deficiency—fluoride exposure should be considered as a contributing factor. The findings of the study raise particular concerns about the validity of community fluoridation as a safe public health measure." (Peckham et al, 2015)

⁹⁰ Peckham S, Lowery D, Spencer S. 2015. Are fluoride levels in drinking water associated with hypothyroidism prevalence in England? A large observational study of GP practice data and fluoride levels in drinking water. J Epidemiol Community Health 69(7):619-24. https://www.ncbi.nlm.nih.gov/pubmed/25714098

- A. Peckham's findings are not totally unexpected, because of the experience of doctors using fluoride to lower thyroid function in patients with hyperthyroidism. Hypothyroidism is a very common disorder in the US. In fact, one of the most prescribed drugs in the USA is synthroid, which is used to treat hypothyroidism. It can have serious adverse health effects.
- B. Race may be a factor in sensitivity to certain thyroid diseases, which may make minorities more vulnerable to fluoride's impacts on thyroid function
- C. Reduced thyroid function in pregnant women is linked to reduced IQ in their children and there is accumulating evidence that fluoride, at levels within the range to which fluoridated populations are exposed, is associated with lowered IQ (see section 14 above). Fluoride's effect on thyroid function might be one mechanism by which it lowers IQ.

Malin et al, 2018. In a large study of the Canadian population did not find an association between fluoride exposure and TSH levels (a biomarker for HYPOthyroidism) in the general population but she did find that the subset of the population which had outright or borderline iodine deficiency had their TSH levels raised further by fluoride exposure.

In other words, those who were already pre-disposed to low thyroid function (because of low iodine intake) had their condition made worse by fluoride exposure.

X. RISK: CANCER

The Nuffield Committee recommended evaluating fluoridation on the "potential" of harm.

Thiessen⁹¹ (2010) "The EPA should be aware that three U.S. courts have found fluoridated water to be carcinogenic to humans (described in detail by Graham and Morin 1999). The NRC's committee on fluoride toxicology unanimously concluded that 'Fluoride appears to have the potential to initiate or promote cancers,' even though the overall evidence is 'mixed' (NRC 2006a). . . The question becomes one of how strongly carcinogenic fluoride is, and under what circumstances."

Bassin (2006)"We observed that for males diagnosed before the age of 20 years, fluoride level in drinking water during growth was associated with an increased risk of osteosarcoma, demonstrating a peak in the odds ratios from 6 to 8 years of age. All of our models were remarkably robust in showing this effect, which coincides with the mid-childhood growth spurt." (Bassin, et al., Cancer, Causes & Control, 2006)

Osteosarcoma is a rare, but deadly, form of cancer that strikes primarily during the teenage years. A national case control study published in 2006 by Harvard scientists found that boys exposed to fluoridated water during their 6th, 7th, and 8th years of life (the mid-childhood growth spurt) had a significantly elevated risk of developing osteosarcoma during adolescence. (Bassin 2006). The sex-specific link between fluoride and osteosarcoma in young males is consistent with the government's animal study, (NTP 1990), which found osteosarcomas in the fluoride-treated male rats, but not the female ones. It is also consistent with previous studies by the National Cancer Institute and New Jersey Department of Health, which both found associations between fluoridation and osteosarcoma in young males, but not females. (Cohn 1992; NCI 1990)

The plausibility of a fluoride/osteosarcoma connection is grounded in the three considerations:

- 1. Bone is the principal site of fluoride accumulation, particularly during the growth spurts of childhood;
- 2. Fluoride is a mutagen when present at sufficient concentrations; and
- 3. Fluoride stimulates the proliferation of bone-forming cells (osteoblasts), which may "increase the risk for some of the dividing cells to become malignant." (NRC 2006).

A number of studies did not find an association between fluoride and osteosarcoma. However, they were not "age-specific" and not as carefully controlled. Douglass compared bone tumors with osteosarcoma and did not repot a significant increase in bone fluoride concentrations. However, he did not compare fluoride concentrations with age controlled healthy bone fluoride

⁹¹ KM Thiessen, Senes Oak Ridge, Inc. Center for Risk Analysis. Comments on the Need for Revision of the NPDWR for Fluoride May 27, 2010 p. 8. https://fluoridealert.org/wp-content/uploads/connett-2010.pdf

concentrations. Similar age normal bone has about 200 ppm, the tumors double and osteosarcoma triple the fluoride concentration. Comparing the osteosarcoma bone with normal bone does show a significance.

Takahashi⁹² (2001) reported, "cancers of the oral cavity and pharynx, colon and rectum, hepatobiliary and urinary organs were positively associated with FD. This was also the case for bone cancers in male, in line with results of rat experiments. Brain tumors and T-cell system Hodgkin's disease, Non-Hodgkin lymphoma, multiple myeloma, melanoma of the skin and monocytic leukaemia were also correlated with FD. Of the 36 sites, 23 were positively significant (63.9%), 9 not significant (25.0%) and 4 negatively significant (11.1%). This may indicate a complexity of mechanisms of action of fluoride in the body, especially in view of the coexising positive and negative correlations with the fluoridation index. The likelihood of fluoride acting as a genetic cause of cancer requires consideration."

⁹²Kosei Takahashi, Kenji Akiniwa, Kenichi Narita. Regression Analysis of Cancer Incidence Rates and Water Fluoride in the U.S.A. based on IACR/IARC (WHO) Data (1978-1992). Journal of Epidemiology. https://www.jstage.jst.go.jp/article/jea1991/11/4/11_4_170/_article/-char/ja/

XI. RISK: ENVIRONMENTAL JUSTICE

Other Potential Harm. (See also endnotes)

Fluoride ingested appears to go to all tissues. There are no tissues which appear safe from ingested fluoride. Only time will confirm whether fluoride harms all tissues. Some scientists have the greatest concern for the harm to the mitochondria.

A major prospective cohort study from Sweden demonstrates a higher risk of hip fractures in post-menopausal women associated with long term exposure to natural fluoride *at levels in water in the same range as America fluoridates its water* [Helte et al., 2021].

Recent epidemiological studies conducted in the United States, using individual biomarker measures of fluoride exposure, reported an association between low to moderate fluoride intake and impaired renal and hepatic function [Malin et al., 2019], increased risk of hyperuricemia [Wei et al., 2021], as well as adverse effects on reproductive endocrinology in U.S adolescents [Bai et al., 2020].

African Americans and Hispanics have been shown to be at an increased risk of developing dental fluorosis, and have a higher risk of suffering from the more severe forms of this condition (Russell, 1962; Butler et al., 1985; Williams and Zwemer, 1990; Beltrán-Aguilar et al., 2005; Martinez-Mier and Soto-Rojas, 2010).

Fluoride is more toxic when exposure is accompanied by poor nutrition, especially low iodine and calcium intake. Poor nutrition is more likely to occur in low-income families than those with higher incomes.

Lactose intolerance is more frequent among Blacks and other ethnic groups than whites. Central and East Asians are 80-100% lactose intolerant (de Vrese, 2001); Native Americans are 80-100% lactose intolerant (National Institute of Child Health and Human Development, 2006); African Americans are 75% lactose intolerant, and Southern Indians are 70% lactose intolerant (de Vrese, 2001). Less consumption of dairy products typically means lower exposure to calcium. Calcium in the diet helps to a certain extent to protect against absorption of fluoride from the gut.

African Americans consume significantly more total fluids and plain water, and thus receive more fluoride from drinking water, than white children (Sohn et al., 2009).

Minority families are less likely to breast-feed their children. As human milk contains very low levels of fluoride (Ekstrand et al., 1981, 1984; Sener et al., 2007), when baby formula is made up with fluoridated water it leads to over 100 times more exposure to fluoride than breast-feeding (see 6.5 above). African Americans are less likely to breastfeed than most other racial groups: "non-Hispanic blacks had a lower prevalence of breastfeeding initiation than non-Hispanic whites in all but two states..."-(CDC, 2010).. If the parent reduces the amount of formula to save

money as many poor parents do (Stein 2008; Egemen et al., 2002; Parraga et al., 1988), and adds more water than recommended, these children will receive even higher levels of fluoride.

Minority communities have a greater incidence of kidney disease. Poor kidney function increases fluoride's uptake into the bone, which is likely to increase the rates of arthritis and hip fractures (over a lifetime).

Minority communities have a greater incidence of diabetes, some forms of which lead to an increased consumption of water, which in turn leads to a greater consumption of fluoride.

(Sohn et al., 2009). Sener et al., 2007), African Americans are less likely to breastfeed than most other racial groups: "non-Hispanic blacks had a lower prevalence of breastfeeding initiation than non-Hispanic whites in all but two states..." (CDC, 2010).. If the parent reduces the amount of formula to save money as many poor parents do (Stein 2008; Egemen et al., 2002; Parraga et al., 1988),

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XII. ALTERNATIVES TO FLUORIDATION

If a person seriously wants to ingest fluoride, alternatives are available. The FDA has not approved fluoridation nor swallowing fluoride toothpaste. Swallowing a pea size of fluoridated toothpaste is an alternative, provides individual choice, is less expensive but still not ethically ideal. Prescriptions for supplements and topical fluoride application in schools and oral hygiene has been suggested.⁹³

However, the best alternative is oral hygiene and diet instruction along with raising the socioeconomic status of a community.

⁹³Ethics Consultation Report Ethical Considerations in Community Water Fluoridation, by the Public Health Agency of Canada's Public Health Ethics Consultative Group, December 18, 2018 p.1. https://www.caphd.ca/sites/default/files/Ethical%20Considerations%20for%20Community%20Water%20Fluoridation.pdf

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From: Tammi Chappell

Sent: 4/29/2022 11:29:53 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Keeping of animals

External Email

Hello,

I would appreciate if you would postpone this issue for now. I'm a horse owner would like to be more educated on this issue and what is expected of us .Also, many horses owners do not belong to a chapter who aren't aware of the this issue. This would give us more time to be educate and educate non chapter members so the can vote too.

My other concern is homeless waste/ trash is now appearing in our woods/trails. For example, we have a homeless persons living at Danville woods, possibly 3 .There has been three different tents at Danville in different areas in the woods.

Please understand, horses are part of the land that belong here. Housing developments destroy more land than horse manure.

Thank you, Tammi From: Yukari

Sent: 6/2/2022 11:19:28 AM

To: DOH WSBOH

Cc:

Subject: We do not support forced mRNA shots to humans

External Email

Dear the agencies

I have wrote to ask not to mandate mRNA to anybody many many times I the past. We knew it that you all will be push this again. I'm sick and tired of writing this public comment many times but I need to write as a mom of three and as a person who knows the human

Rights as commonsense.

My great grand farther was passed away within three days after the third booster shots in Japan. Not only he was passed away but also many of my parents' friends have dead with the mRNA.

I knew that all of what is happening is part of agenda by UN called agenda 21 and agenda 2030 since the beginning.

All of the world wide agencies have to obey what they require. Who is making tons of money for this? It is the big Pharma.

Mandating experimental shots is called communism and if anyone who knows what is happening and just ignore the fact that many people have died and are having severe side effects by mRNA, it is very sad to see but it is called communists who tend to listen to only the authority to only keep your own sake. What We have been eye witnessing is exactly what happened back in WW2.

Many of them noticed that none of their family member or friends or employees have passed way with this covid of 99.99999 percent of recovery rate. Why would you stop claiming flu or cold anymore?

The common sense is that We are humans who have the authority to protect our bodies. Do not be slave of big Pharma and tech what have been pushing this so hard since the closure.

Sincerely

,

Yukari Evins

From: Sheryl Barbour

Sent: 4/27/2022 9:25:36 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: keeping of animals

External Email

Please refrain from deciding this at this point without the input of those it will directly involved, both from recreational and business standpoints.

S A Barbour

Owner of a horse ranch, chicken laying producer and organic meat herd.

Sent from Mail

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%forWindows

E D'I IMI

From: Richard Mahar

Sent: 5/26/2022 12:31:54 PM

To: DOH WSBOH

Cc:

Subject: RE: CR-103 Alert: Rule Adoption, Chapter 246-90 WAC, Local Board of Health

Membership



attachments\2D361ED3159D4F5A image001.png

External Email

Dear BOH,

I have a question and concern about the below RCW and the powers and duties of the local board of health.

Here is the quote:

RCW 70.05.060

<a href="https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fapp.leg.wa.gov%2FRCW%2Fdefauldefau

Powers and duties of local board of health.

Each local board of health shall have supervision over all matters pertaining to the preservation of the life and health of the people within its jurisdiction and shall:

In light of the last two years of pandemic and the ever growing inclusion of so many issues into "life and health of the people" this RCW seems very over extensive and deep. Are there any breaks or limitations? "All matters pertaining to" is very broad and overreaching to many people I represent.

Thanks for your upcoming response.

Richard Mahar

Commissioner District 1

Skamania County, WA

"Grateful to the Supreme Ruler of the universe for our liberties"

From: DOH WSBOH <WSBOH@SBOH.WA.GOV> Sent: Wednesday, May 25, 2022 2:33 PM

Subject: CR-103 Alert: Rule Adoption, Chapter 246-90 WAC, Local Board of Health

Membership

** WARNING: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. **

The Washington State Board of Health (Board) has adopted rules to establish chapter 246-90 WAC, Local Board of Health Membership. The rules go into effect on July 1, 2022. The CR-103 (document attached) announces the new rules, filed as WSR 22-11-039.

This new chapter establishes rules regarding the appointment process for non-elected members of local boards of health as required by Engrossed Second Substitute House Bill 1152

https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Flawfilesext.leg.wa.gov%2Fbiennium22%2FPdf%2FBills%2FSession%2520Laws%2FHouse%2F1152

S2.SL.pdf%3Fq%3D20210525101041&data=05%7C01%7CWSBOH%40SBOH.WA.GOV%7C505797ff3fa143(E2SHB 1152).

The concise explanatory statement (document attached) summarizes the differences the between the proposed rules and adopted rules and responses to public comments. Among other things, the Board rules:

* Establish the purpose and scope of the chapter.

- * Define terms for use throughout the chapter.
- * Establish the requirements for any resolution, ordinance, or other mechanism for amending the composition of a local board of health.
- * Establish requirements for recruitment activities for nonelected members of local boards of health.
- * Establish requirements and provide flexibility for the selection of nonelected members of local boards of health.
- * Describe the exceptions to the chapter in alignment with E2SHB 1152.

For more information regarding this rule please contact email Board Staff at LBOHComposition@sboh.wa.gov < mailto:LBOHComposition@sboh.wa.gov > .

Thank you,

(360) 236-4110

P.O. Box 47990, Olympia, WA 98504-7990

Location

- Website
- https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fsboh.wa.gov%2F&data=05%7C01
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- · Subscribe <mailto:wsboh@sboh.wa.gov?subject=Please%20Add%20My%20Name%20to%20the%20WSBOH%20Em/</p>

This announcement is being sent to the Board's general and Local Board of Health Composition rule distribution lists. Please excuse any duplication.

From Manay the Coul Dancer

From: Nancy the Soul Dancer Sent: 5/5/2022 2:16:31 PM

To: DOH WSBOH,Amy Bolen,David Wolbrecht,jarnold@kirklandwa.gov,Jon Pascal,Kathi Anderson,Kelli Curtis,kraymond@kirklandwa.gov,Kurt Triplett,Mayor Penny Sweet,Neal

Black, Toby Nixon

Cc:

Subject: DR. Campbell's report

External Email

The Pfizer documents - YouTube

< https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.youtube.com%2Fwatch%3Fwatch%

France David Michalla (CDOII)

From: Davis, Michelle (SBOH) Sent: 4/18/2022 11:55:03 AM

To: DOH WSBOH

Cc:

Subject: FW: Omicron



attachments\91768FEF6CBE48ED_image0.jpeg

Michelle Davis, MPA (she/her)

Executive Director

Washington State Board of Health

michelle.davis@sboh.wa.gov <mailto:michelle.davis@sboh.wa.gov>

360-236-4105

Website

https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fsboh.wa.gov%2F&data=04%7C01 | Facebook

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https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftwitter.com%2FWASBOH&data=0

From: Monica Huckleberry < ronron.34@icloud.com>

Sent: Monday, April 18, 2022 11:15 AM

To: Davis, Michelle (SBOH) < Michelle.Davis@sboh.wa.gov>

Subject: Omicron

External Email

This is government over reach and we the people will not accept this pre planned idea. For one the omicron virus has proven its self that it does not cause GREAT number of harm on the population. You as a president of health in Washington State will cause unnecessary unrest in this state if you and other leadership accept such ideas. We the people are not ignorant on this matter therefore please reject ideas from the above White House release that I pinned to this email.

This country has Constitution and Bill of Rights for we the people please do follow.

I pray you had a wonderful Easter.

Monica Campbell P.O. Box

Malden WA 99149 Registered Voter in Washington State Sent from my iPhone

From: Jamie Farr

Sent: 5/3/2022 6:50:15 PM

To: DOH WSBOH

Subject: Fwd: COVID 19 osd disabilities kallisti allenson Labyrinth allenson serendipity

allenson

External Email

----- Forwarded message ------

From: Jamie Farr <jezzabell17@gmail.com <mailto:jezzabell17@gmail.com> >

Date: Mon, May 2, 2022, 7:31 PM

Subject: COVID 19 osd disabilities kallisti allenson Labyrinth allenson serendipity allenson

To: <covid.vaccine@doh.wa.gov <mailto:covid.vaccine@doh.wa.gov> >, Debbie Haddon <dhaddon@osd.wednet.edu <mailto:dhaddon@osd.wednet.edu> >, Sean Huff <shuff@osd.wednet.edu <mailto:shuff@osd.wednet.edu> >, Sean Shaughnessy <sshaughnessy@osd.wednet.edu <mailto:sshaughnessy@osd.wednet.edu> >, Caitlin Wood <cwood@osd.wednet.edu <mailto:cwood@osd.wednet.edu> >, Lorie Gillespie <lgillespie@osd.wednet.edu <mailto:lgillespie@osd.wednet.edu> >, <klturcotte@osd.wednet.edu <mailto:klturcotte@osd.wednet.edu> >, Michael L. Cimino <mcimino@osd.wednet.edu <mailto:mcimino@osd.wednet.edu> >, <adavis@osd.wednet.edu <mailto:adavis@osd.wednet.edu> >, <parent@ed.gov <mailto:parent@ed.gov> >, <ada.complaint@usdoj.gov <mailto:ada.complaint@usdoj.gov> >, <maria.aponte@co.thurston.wa.us <mailto:maria.aponte@co.thurston.wa.us> >, Micah Shelton <mshelton@osd.wednet.edu <mailto:mshelton@osd.wednet.edu> >, Marisa Schaff <mschaff@osd.wednet.edu <mailto:mschaff@osd.wednet.edu> >, <familyaccess@osd.wednet.edu <mailto:familyaccess@osd.wednet.edu> >, Nancy Faaren <nfaaren@osd.wednet.edu <mailto:nfaaren@osd.wednet.edu> >, <forgottenorfree@gmail.com <mailto:forgottenorfree@gmail.com> >, Betsy Durant <bdurant@osd.wednet.edu <mailto:bdurant@osd.wednet.edu> >, Lucy Baltazar <lbaltazar@osd.wednet.edu <mailto:lbaltazar@osd.wednet.edu> >, Amy Loesch <aloesch@osd.wednet.edu <mailto:aloesch@osd.wednet.edu> >, Burke Anderson <BANDERSON@osd.wednet.edu <mailto:BANDERSON@osd.wednet.edu> >, <acrawford@osd.wednet.edu <mailto:acrawford@osd.wednet.edu> >, <kzarate@osd.wednet.edu <mailto:kzarate@osd.wednet.edu> >, Patrick Murphy <pmurphy@osd.wednet.edu <mailto:pmurphy@osd.wednet.edu> >, <welfarerights@riseup.net <mailto:welfarerights@riseup.net> >, <vickie.larkin@co.thurston.wa.us <mailto:vickie.larkin@co.thurston.wa.us> >, <sgifford@osd.wednet.edu <mailto:sgifford@osd.wednet.edu> >

My name is Jamie Farr I have three children in the Olympia School district kallisti allenson labyrinth allenson and serendipity allenson

To talk about how I feel the covid-19 pandemic has been handled with the Olympia School district and my disabled children

I took my kids out 2 weeks before school let out for covid I kept my kids out at home until I was told my only option was to unenroll my kids from the leap and hope programs and enroll online one of my kids was held back in preschool so he could enter the LEAP program in kindergarten and is now in the Hope program the other is in her last year of leap and will be heading into the Hope program next year it has been a long struggle and would be devastating to there mental health and growth as individuals with disabilities to lose out on the services provided to them by these programs the damage would be hard to overcome they have come so far thanks to the structure and support of the leap and hope teams without the progress that they have made I don't know how they would have found success to the level that they are now and I can't imagine them having their right to an education met or their IEP goals...

My oldest was unable to have his IEP met at all over the pandemic and I fought tooth and nail to get him more one-on-one zooms as I do not have the education to teach him and he couldn't understand what to do or keep up with the instruction he never did get those extra zoom classes while on the computer at home

In my opinion he has been failed by the school system largely because he has less behavioral issues and when I finally was able to hold him back the pandemic happened I tried unsuccessfully to hold him back from second grade and didn't succeed till 5th grade When I read the covid policy I was so upset I could see all the effort to keep people from being able to make an informed decision in order to get notified it had to be more than one kid within 6 ft of your kid not related or having ties outside of the school I'm sure that there's more to it that I'm not remembering and I can probably find the email somewhere but it seemed to me that they just didn't want to tell us what was going on No I don't expect names or identifying information of infected students but I would have liked to have had enough information to make an educated decision for the health and safety of my kids like how many in the district in my schools or in each grade I think that's more than reasonable?

If it was not such a threat then why all the circles?

In my opinion it comes down to money and control?

There is money involved in kids being in school their are jobs the district and government makes me feel like kids are just numbers and my kids numbers are statistically unimportant.

Individually there are people in the district that I know care very deeply for my children but on paper they are disposable .

I know this because I have had to fight so hard to get their needs met.

I can't get solid information on their safety.

There wellbeing is ignored when policies let sick kids come to school when all the teachers are made to get vaccinated.

When I have To choose my kids special education or their health.

When everyone knows the online programs fail my kids disabilities and the covid policies endanger them but act like I have a choice.

Like I don't have to legally send my kids to school.

Like me failing to address there disabilities isn't something I'd get in trouble for .

When I'm asked to send my kids to school because they have no symptoms but other people in my house do when I know they go to school with kids that's families are positive when I can tell you they are connected to positive families across four schools when the schools and school districts choose not to inform me that the covid policies have changed so I am unable to choose if I still want to or can take the risk.

When the schools and the district know my kid has gastroenterology and weight issues and I'm nervous about the covid policies and feel unsafe already we are unimportant.

When The schools say it's Thurston county health department that makes the policies and Thurston county says it's Washington State and the federal government.

When the federal government says home test can give a false positives and people can be asymptomatic but they make policies that let others get sick.

Honestly every one of you is failing us because the federal government knows it will make people sick because the state of Washington chose not to step up and give more protections and so did Thurston county.

You all chose not to protect us knowing that we could get sick because we are not as valuable as the many that will not be affected.

At the beginning of the pandemic I asked my kids gastroenterology doctor for a note to take my kids out of school for my son's safety but they said it wasn't on the approved diagnosis list but now we know how involved the gut is with covid-19 not to mention my kid has low weight and can't afford to be sick if it can be avoided .

honestly I can't believe I have to justify why my kid shouldn't be put at risk of getting sick.

I believe no kid should be put at risk of getting sick intentionally and covid is not without risks even for healthy kids if it was me taking these risks with my kids I would be accused of neglect and possibly face criminal charges like the people that were throwing covid parties or intentionally getting people sick.

How is this any different you are knowingly exposing people and kids to covid?

Who makes the list that the doctors and schools get to follow?

Why did we drop masks?

I was told today by somebody at the Thurston county health department they have to make people politically happy like what !!!!! I thought you guys were supposed to keep kids safe.

Who controls the funding?

Who decided that IEPs and special education could take a back seat because of the pandemic?

Who was pushing for blanket protections for covid-related liabilities like they knew that people's rights were going to be violated but wanted to protect the people that were doing it instead of protecting the people before it happened?

Who has the responsibility to ensure Fair access to a safe healthy learning environment and adequate accommodation for disabilities and a right to education?

My kids lost their doctor because I didn't feel comfortable ridding four city buses to one half hour or hour appointment when it was not an emergency and I live across the street from the hospital and within walking distance of a walk-in clinic as soon as my kids went back to school and I felt I could not keep them from being exposed I called to make appointments to find their doctor had dropped them without me knowing. They told me to call back in a month to see if they were taking my insurance. I called back and they told me to call back in a month again to see if they were taking my

insurance cuz they still weren't.

I called back again and they still were not taking my insurance and told me to call back in a month I decided I could no longer wait and decided to call other doctors but I couldn't find anybody to take them.

I couldn't find a doctor and it didn't seem like our old doctor was going to take us anytime soon.

My daughter's tooth started to hurt but you guys were talking about possibly closing the schools again so I waited 2 weeks and then I made an appointment for her to see the dentist. I went to my appointment to find out that they no longer would cover anesthetic for kids with adult teeth but my kids are disabled and cannot get their teeth worked on without being put under even the mask was traumatizing for the couple minutes that you had to wear it last time and she was biting and kicking and still remembers the smell.

Her dentist was no help and would not give me a referral or tell me how to get an accommodation for the insurance company to cover it for her disability luckily Roosevelt helped me find a dentist that would accommodate her disability and paid for her to go to Seattle children's to get a referral and her first visit. Unfortunately I still didn't have a doctor and she couldn't get checked for her anesthesia I was still calling and finally found someone that said that they would take her as long as I changed her insurance cards first. When the insurance company called them they told them they were not taking those ages anymore I was getting desperate and asked the insurance company to find me a doctor they called 117 doctors in the area they couldn't even find one they told me to call back in a couple days I did and they still hadn't found me a doctor in the meantime my son went to his dentist and also needed to go under anesthesia but I still didn't have a doctor. My insurance found me a doctor that was 36 miles away in University place I don't have my own transportation I tried to call paratransit and ran into problems. Luckily again thanks to Roosevelt they offered to pay the gas to those appointments in the meantime I called the healthcare authority and they told me if I found a different insurance company out of the five that found a doctor in this area I could switch by the 1st unfortunately I called all five insurance companies and no one could find me a doctor in the area. Wile I waited my daughter's teeth broke more. My daughter went to her appointment and got a waiver to go under anesthetic and was referred to an optometrist that I need to find.

The next day my son went to the doctor and he got a referral to go back to the GI that I asked for and a letter to go under sedation. The next day I got sick with covid and that Monday today my other son didn't get to go to his doctor's appointment. My kids are 10 and 12 and might lose adult teeth because I cannot get the care for them

through the health system right now in a timely fashion because of their disabilities and the pandemic.

We are sick right now because these policies failed to keep my children safe. Before I could get an appointment for their surgeries before I can get to an optometrist before we could get back to the gastroenterologist and my last kid could get their doctor's appointment and the shots that he needs we were sick.

i called The schools to tell them we had been exposed to covid and some of us had bad symptoms as well as I know families with kids in the same schools as my kids and also my neighbor girls that are my daughter's best friends family tested positive I was told to send my kids that didn't have symptoms to school even though we all know you can be asymptomatic and also home tests have been known to give a false negative and I told them we had not even been tested.

I immediately felt like the schools had failed us and this is why we are sick I'm very cautious and barely go anywhere to try to protect my kids to turn around and have you guys completely ignore the science that can keep them healthy.

I feel like these policies are why we are sick. why my kids IEPs have been violated. why I have had to pick between my children's health and their disabilities. It has interfered with their health as two of them cannot get their long-awaited surgeries

It is affecting my mental health because I feel I am not allowed to protect my kids and make sure all their needs are met and the schools and the government failed to let me do so.

I have called the schools and the school district and the Thurston county health department and the covid line at the Washington health department as well as Jay inslee and now all of you I hope you can see my family's struggle and reflect on how these policies and numbers affect real people with health and education as well as disabilities and mental well-being.

I want to thank you shaughnessy for offering to drop off some covid tests and offering to have n95 masks available for my daughter if I choose to have her return back to school. I honestly don't know if I want to send my kids back to the school district with the rules like this because I do not feel they are safe I've called my kids out for 2 weeks because I do not feel sending them back and making other people sick is something I can live with and I do not feel 5 days is going to be long enough to not get other people sick I do not want anybody else to go through what we are now going through.

please let me know how to fix this situation and hopefully we can find a way to meet my kids needs for health safety and education as well as disabilities they are not just statistics and their abilities don't change just because the laws do.

My words will change probably nothing to very little but I sincerely hope that at least it gives you guys something to think about signed Jamie Farr $360\ 451\ 8687$

From: Amy Throop

Sent: 4/19/2022 7:19:20 AM

To: DOH WSBOH, DOH Secretary's Office

Cc:

Subject: Thank You for Listening to the Citizens of WA State

External Email

Dear BOH Members:

Thank you for listening to the concerns of us as citizens of Washington State and for voting to adopt the TAG's recommendation to not add the COVID-19 vaccine to Washington's list of required immunizations for child care and school entry at your April 13 virtual public meeting. We are confident that the emerging scientific data will continue to affirm your decision.

Thank you for your thoughtful consideration in your role to protect the health of the children in our State.

Respectfully

Amy Throop, Klickitat County

From: theresa percy

Sent: 4/26/2022 10:09:50 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Request to postpone draft proposal - animal waste rule

External Email

I am writing to request a postponement of the draft proposal for animal waste from the JUne meeting until a committee of stakeholders can be formed to review the many concerns regarding: mixing livestock oversight with non-livestock, misunderstanding of stockpiling and composting manure, lack of uniformity of enforcement due to implementation by local health officers, and concern of complaint abuse by urban neighbors.

This is a critical issue which if not properly reviewed and address will a have hugh impact on animal ownership.

Thank you for your consideration,

Theresa Percy

From wish and metands @asl sam

From: richardmforde@aol.com Sent: 4/14/2022 12:23:11 PM

To: DOH WSBOH

Cc:

Subject: Safe and Effective

External Email

To the Board:

The recent Pfizer data dump proves that the "safe and effective" mantra is a lie. As you may know, or may have ignored, there was an attempt to hide the Pfizer trial data for 75 years, but a court order recently released it, and the reports illustrate the deception and disconnect with real world data.

It has been known all along that the shots were not safe and effective. It does not help public trust to continue the lie.

Deanna Burlingame Eatonville

-----Original Message-----

From: follow.it <inbox@follow30.com>

To: richardmforde@aol.com

Sent: Thu, Apr 14, 2022 10:07 am

Subject: Informed Choice WA - new message

https://api.follow.it/logo/logo-white-bg.png

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ffollow.it%2Finformed-choice-

wa&data=04%7C01%7Cwsboh%40sboh.wa.qov%7C2550ff5b0cd54a6933b308da1e4bfff0%7C11d0e21726

Informed Choice WA Edit

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Ffollow.it%2Finformed-choice-

wa%3Faction%3DeditFeedSettings&data=04%7C01%7Cwsboh%40sboh.wa.gov%7C2550ff5b0cd54a6933t

Unfollow

Breaking News: WA BOH Votes

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Inisev Ltd., 11407 SW Amu St, Suite #AAM624, Tualatin, OR 97062, USA

Franci Haathau Hawisan

From: Heather Harrison Sent: 6/2/2022 4:09:50 PM

To: DOH WSBOH

Cc:

Subject: COVID Shots

External Email

I would like to make sure the board is aware that I am against mandating the Covid Shot for K-12 school! If this happens I will home school my children! The public school system is already losing lots of funds because enrollment in public schools is down! This will effect public schools enrollment and funding even more if Covid shots are mandated!! I would like to support agenda item 13 the citizen petition for rule making that is on agenda for June 8th meeting! Please pass this! Thank you,

Heather Harrison

Sent from my iPhone

From: Brigitta Jones

Sent: 4/28/2022 9:17:50 PM

To: DOH WSBOH, DOH Secretary's Office

Cc:

Subject: Thank You for Listening to the Citizens of WA State

External Email

Dear BOH Members: Thank you for listening to the concerns of us as citizens of Washington State and for voting to adopt the TAG's recommendation to not add the COVID-19 vaccine to Washington's list of required immunizations for child care and school entry at your April 13 virtual public meeting. We are confident that the emerging scientific data will continue to affirm your decision. Thank you for your thoughtful consideration in your role to protect the health of the children in our State. respectfully, Brigitta Jones

From: Davis, Michelle (SBOH) Sent: 5/2/2022 8:12:38 AM

To: DOH WSBOH

Cc:

Subject: FW: Board Decision on Covid-19 vaccines

From: Janet Young <antiejan@gmail.com> Sent: Friday, April 29, 2022 11:40 AM

To: Davis, Michelle (SBOH) < Michelle.Davis@sboh.wa.gov>

Subject: Board Decision on Covid-19 vaccines

External Email

After listening to all of the Board and TAG meetings, I am pleased with the thorough consideration of the need or not to vaccinate children in our state for Covid-19. I appreciate all of the time each member had to spend in their decision making.

I am very appreciative of the Board's decision not to recommend mandatory Covid-19 vaccination for Washington's school children. This is a very serious subject that parents need to ponder and make a decision for their own children. We do not know the long-term effects of this vaccine in children.

Sincerely,

Janet M. Young

Maple Valley, WA

April 29, 2022

From: Butch Havens

Sent: 4/28/2022 5:07:55 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: 48DB6D07-9A78-49DF-A42E-2D7AFD19D39C

External Email

Frami Classes Stuart D (CDOH)

From: Glasoe, Stuart D (SBOH) Sent: 5/27/2022 10:40:46 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: FW: My Public Comments

Stuart Glasoe

SBOH Health Policy Advisor

360-236-4111

From: Dan DeGroot <skyridgefarms@hotmail.com>

Sent: Thursday, May 26, 2022 12:26 PM To: DOH WSBOH <WSBOH@SBOH.WA.GOV>

Subject: My Public Comments

External Email

This 'rule' was originally designed for "Keeping of Animals" in an urban setting. Facilities located in an agricultural zoned area should be exempt if there is a regular inspection of the facilities by one or more state or Federal agencies.

I have a dairy facility that is inspected by the Grade A Milk Inspector several times annually and includes inspection of manure and animal housing areas to ensure there is not excessive stockpiling of animal nutrients. I am inspected regularly by the Nutrient Management Inspector from the Washington State Dept of Agriculture. I maintain a Federal Confined Animal Feeding Operation (CAFO) Permit that is regulated by the EPA, the Washington Department of Ecology and the Washington Department of Agriculture. I had been involved with air quality plans and inspected by the Yakima Regional Clean Air Authority. I believe that I am well inspected and watched closely by both the State, Federal and Local governments.

Not providing exemption to those with regulated facilities in ag zoned areas will only cause confusion, to all those inspecting and being inspected, by adding another set of rules. This type of rule is being promoted by those who have a bias against dairies and animal agriculture. This is a broader topic that should not reside with the Local Health District.

Skyridge Farms

From: Jotform Sent: 5/5/2022 1:38:11 PM To: DOH WSBOH Cc:
Subject: Re: Stop The Child Vaccine Mandate Petition - Barbara Hernacki
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https://cdn.jotfor.ms/assets/img/logo2021/jotform-logo.png
Stop The Child Vaccine Mandate Petition
Name
Barbara Hernacki
Email
barbhernacki@comcast.net
Zip

, , , , 98052

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From: Joshua Allen

Sent: 4/23/2022 1:06:09 PM

To: DOH WSBOH

Cc:

Subject: Re: CR-103E Alert: Emergency Rule Adoption, Chapter 246-101 WAC -

Notification and Reporting of COVID-19

External Email

You really are the most evil tyrannical form of oppression and discriminatory body across the board top to bottom. You must be aware of the situation by now and are flat out ignoring the facts. There will be a place for the evil agendas You have ushered in by not listening or care to concern, what over 20,000 physicians have stood against world wide. Unreported facts deaths and the increase of children ADE. Obviously, Have no worry to you. Must be pald off can be the only conclusion! For your crimes on these measures will be studied for generations to come. How can they get It so wrong? The health board sly under peoples noses you are passing and changing laws for big Pharmas monopoly and you are massively corrupt. There are so many resources available outside the for profit CDC and FDA. Whom are both unreliable false retractable non science based oligarch selfish conclusions. So many examples of facts that dosen't matter the evidence I can provide but you are the rulers on matters here. Where I am a regular Joe researcher and citizen; No brainer for me to research want the truth then seek the truth. Can find the atrocities, crimes. Clear as day by the manufactures themselves, patents, the research studies flawed and haulted, plus the CEOs of these companies their own admissions of this lie you are holding on too! If I can find these facts review 100s of official documents released by the courts CDC and the WHO you are not professional at all to raise your own questions about the safety and effectiveness of the fake vax or as the SEC filings state from bio n tech and PHIZER, Moderna, JnJ, Aztrazenica they are gene therapies. These experimental applications have not only caused more deaths and ADE than the year prior with no vaccine available The CEO of Phlzer not even a MD he's a veterinarian. The science about the entire gambit of lies has so may layers that you must know you are dictating and murdering The people who's health you are n a position to protect. Get a Life retards snd leave ours alone you pricks!

Sent from my iPhone

On Apr 21, 2022, at 2:36 PM, DOH WSBOH <WSBOH@sboh.wa.gov> wrote:

The Washington State Board of Health (Board) has adopted a seventh emergency rulemaking order to continue the requirements established in WAC 246-101-017 – Novel Coronavirus (SARS-CoV-2), Coronavirus Disease 2019 (COVID-19) Reporting. The emergency rule is effective April 20, 2022 and will be in effect for 120 days. The CR-103E announces the emergency rulemaking order, filed as WSR 22-09-082 (attached).

Health and Human Services

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- * Continues the designation of COVID-19, as a notifiable condition.
- * Continues the requirement for health care providers, health care facilities, laboratories, local health jurisdictions, and the Department of Agriculture to report certain demographic, testing, and other relevant data for each COVID-19 test.
 - * Clarifies reporting requirements by test entity and test type:
- * Entities licensed to conduct moderate or high complexity testing must report all positive, negative, and inconclusive test results from all NAAT and antigen tests performed for COVID-19.
- * Entities licensed to conduct waived tests under a certificate of waiver must report positive test results from all waived tests, excluding antibody testing, for COVID-19.

The Board filed a CR-101, Preproposal Statement of Inquiry, on July 23, 2021 to integrate emergency rule requirements and provisions into permanent rule. More information can be found on the COVID-19 permanent rulemaking web page. <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2Fnotifiable-conditions-covid-19-permanent-rule&data=05%7C01%7Cwsboh%40sboh.wa.gov%7C6c19185772404227b1e108da25649686%7C11d0e21

For more information on this emergency rule visit the Board's website https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2FRulemaking%2Foorcontact notifiableconditions@sboh.wa.gov mailto:notifiableconditions@sboh.wa.gov

Thank you,

<image001.png>

Phone: (360) 236-4110

Mailing Address: P.O. Box 47990, Olympia, WA 98504-7990

Location

- < https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.google.com%2Fmaps%2Fplatering to the first of the following state of the first of the f
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- · Subscribe <mailto:wsboh@sboh.wa.gov?subject=Please%20Add%20My%20Name%20to%20the%20WSBOH%20Em

<WSR2209082-covidreporting-7thCR103E.pdf>

From: Alyssa Barton

Sent: 5/2/2022 5:33:57 PM

To: DOH WSBOH Proposed Animal Waste Rule

Subject: Keeping of Animals



attachments\491C5ACA96F44559_Outlook-1483573618.jpg

attachments\0305C340C1CE4500_SBOH comment letter final 5.2.22.pdf

External Email

Good evening:

Please see the attached from Puget Soundkeeper. Should you have any questions or concerns, please do not hesitate to reach out at 206-297-7002 ext 114.

Regards,

Alyssa Barton
(she/her/hers)
Policy Manager
Puget Soundkeeper Alliance
130 Nickerson Street, Suite 107
Seattle, WA 98109
(206) 297-7002 x114
alyssa@pugetsoundkeeper.org <mailto:julie@pugetsoundkeeper.org>
<mailto:julie@pugetsoundkeeper.org>
www.pugetsoundkeeper.org <mailto:julie@pugetsoundkeeper.org>

Mr. Stuart Glasoe Washington State Board of Health 111 Israel Rd. SE Tumwater, WA 98501

Via email to: stuart.glasoe@sboh.wa.gov

Also submitted to: <u>WSBOHProposedAnimalWasteRule@sboh.wa.gov</u>

May 2, 2022

Re: 2022 Draft Rule Revisions, WAC 246-203-130 Keeping of Animals

Dear Mr. Glasoe:

Puget Soundkeeper Alliance (Soundkeeper) is a 501(c)(3) non-profit environmental organization, with a mission to protect and enhance the waters of Puget Sound for the health and restoration of our aquatic ecosystems and the communities that depend on them. Founded in 1984, Soundkeeper was a founding member of the international Waterkeeper Alliance and today has more than 8,000 members, supporters and volunteers who use and enjoy Puget Sound's marine waters and freshwater tributaries, for commercial, general recreational and aesthetic purposes. At least 176 of our supporters are known to live in communities with permitted Concentrated Animal Feeding Operation (CAFO) facilities; hundreds more live in communities with unpermitted agricultural operations.

Our constituents, and thousands of residents throughout the State of Washington, are at risk due to the failure of our State's regulatory agencies to protect against the public health and environmental harms caused by the keeping of animals. The Board of Health has a unique authority and responsibility to "assure safe and reliable public drinking water and to protect the public health" (RCW 43.20.050 (2)(a)), as well as to "adopt rules and standards for prevention, control, and abatement of health hazards and nuisance related to the disposal of human and animal excreta and animal remains" (RCW 43.20.050 (2)(c)), and to "adopt rules for the prevention and control of infectious and noninfectious diseases, including food and vector borne illness, and rules governing the receipt and conveyance of remains of deceased persons, and such other sanitary matters as may best be controlled by universal rule." (RCW 43.20.050 (2)(f).

We oppose the Washington State Board of Board of Health's (hereinafter "the Board's") draft rule revisions to WAC 246-203-130 (the "Rule"). We oppose the narrowing of the title and scope of the Rule from "Keeping of Animals" to "Domestic Animal Waste" as we disagree with the premise that the Board's unique authority is best suited to local regulation of smaller-scale activities and practices around animal waste alone. We are also concerned that the proposed revisions dramatically weaken existing public health and nuisance protections; fail to set adequate minimum standards to protect the public health from various risks associated with the

keeping of animals; and completely disregard the real and existential public health threat of climate change – a threat that can be exacerbated by the keeping of animals and, in particular, by industrial farm operations – or the environmental justice implications of the Rule.

1) The Board's regulatory authority and responsibility extends beyond managing animal waste.

The original Rule, entitled "Keeping of Animals", was broader than the newly proposed title of "Domestic Animal Waste." In its Background and Policy Recommendations document, ("Backgrounder") without sufficient explanation or supportive rationale, the Board recommends that "the rule should focus on practices involving the handling, storage, and disposal of livestock manure and other domestic animal waste generated on site (not off-site manure transport and use) that present a clear health, sanitation, or nuisance problem." (at 25). We disagree.

Keeping animals can produce dust, odors, haze, and noise; contribute to the spread of disease from both direct and indirect contact with animals and their waste; contaminate soils; contaminate drinking water, groundwater, and surface water; and contribute to climate change through the emissions of greenhouse gasses. These constitute public health hazards and nuisances. Air pollution, water pollution, drinking water contamination, disease, sickness, and disturbances caused by the keeping of animals results in diminished quality of health and life for those affected. The Board documents these risks and more over seven pages in its Backgrounder with more than 100 unique research articles on topics, but then fails to address most of these hazards in the draft revisions.

We object to the narrowing of the title to "Domestic Animal Waste", as an abdication of the Board's responsibility to protect the public health from the aforementioned health hazards and nuisances that may be unrelated to the management of animal waste alone. We also see no justification for excluding off-site manure transport and use from regulation, as the hazards and public health implications of animal waste do not simply disappear as it crosses a property line. We encourage the Board to leave the Rule title as-is, and to assess and regulate the health hazards and nuisance impacts of activities including but not limited to feeding, watering, housing, and transporting animals as well as their waste, to protect communities and public health.

2) The draft Rule revisions dramatically weaken or entirely removes existing public health and nuisance protections.

The Washington State legislature has directed the Board to regulate the storage of animal waste to protect human health. RCW 43.20.050 (2)(c)). The current Keeping of Animals rule reads as follows:

WAC 246-203-130 Keeping of animals.

¹ Keeping of Animals Background and Policy Recommendations of the Washington State Board of Health

- (1) Any person, firm or corporation is prohibited from keeping or sheltering animals in such a manner that a condition resulting from same shall constitute a nuisance.
- (2) In populous districts, stable manure must be kept in a covered watertight pit or chamber and shall be removed at least once a week during the period from April 1st to October 1st and, during the other months, at intervals sufficiently frequent to maintain a sanitary condition satisfactory to the health officer. Manure on farms or isolated premises other than dairy farms need not be so protected and removed unless ordered by the health officer.
- (3) Manure shall not be allowed to accumulate in any place where it can prejudicially affect any source of drinking water.

The draft revisions strike all of this language. In so doing, the Board proposes to dramatically scale back current requirements by:

- eliminating broad public protections against nuisances caused by the keeping or sheltering of animals (current section 1) and replacing them with protections limited to animal waste (draft section 1)
- eliminating strong stable waste collection, storage, and removal requirements (current section 2) and replacing them with vague and poorly defined requirements to collect animal waste containment areas (draft section 3a)
- striking strong and broad public health protections for drinking water (current section 3),

We object to the elimination of language in current sections 1-3 of the Rule. Rather than backsliding, the Board should build on these foundational protections, implementing clear minimum standards to ensure the intent of these protections is assured in light of modern-day animal-keeping practices and the extensive data on the nature and scope of the problems it causes - as documented in the Board's Backgrounder.

3) The draft revisions lack strong minimum standards to protect the public health.

The Board should build on the existing regulations to create stronger minimum standards to protect the public health and prevent nuisances. For example, the Board could keep existing sections 1 and 3 intact and expand section 2 to:

- articulate a more frequent waste removal requirement during the rainy season between October to April
- include all manure (not just "stable" manure, but any manure on any part of the premises)
- expand beyond "populous districts" to all districts, including "isolated premises"

Rural communities can be equally if not more susceptible to the public health risks posed by the keeping of animals.

The draft revisions lay out several requirements for livestock waste stockpiling in a new section (3(d)) excluding waste that is being composted and waste being stored in a lagoon. First, should the Board modify the existing Rule to authorize livestock waste stockpiling when the number of animals or quantity of waste renders it infeasible to cover and store the waste in an airtight container prior to removal (factory farms were likely not envisioned when the original Rule was promulgated in 1936), the Board should articulate which types of livestock operations are authorized to stockpile waste (how many animals, what size footprint, or how much waste?) and which types should continue the practice of keeping the waste in covered, airtight containers with requirements to periodically dispose of the waste.

Second, the Board should outline clear, science-based and appropriately tailored standards for the management of livestock waste by different operations that stockpile waste, adjusted to account for the size and type of operation (cattle, chicken, horse, etc.), the type of waste (liquid vs. solid), and site conditions (slope, soil-type, vegetation type and density, underground geology, hydrological features, etc.). A mature milk cow produces over 120 pounds of liquid feces and urine every day, whereas a horse produces 50 pounds of solid manure a day. The differences in consistency, chemical content, and quantity compounds with each additional animal, which surely necessitates different levels of protections for the public health.

Third, we are aware of no scientific basis why waste being composted or stored in a lagoon shouldn't also be managed as stringently – if not more stringently – than other stockpiles of waste. In fact, liquid manure being stored in a lagoon likely requires far more protections for the public health (greater setbacks from water sources, requirements to be stored in areas with a higher groundwater table, etc.). It is well known that lagoons leak.



image of manure lagoon



image of manure gun © USGS

The practices of storing excess livestock manure in large manure lagoons; transferring or selling livestock manure to third parties for use as fertilizer; and applying manure to fields as fertilizer (by both animal keepers and third parties – and often with a large "gun" or cannon that shoots the liquid waste over fields in a vast spray) are three modern practices that harm the public health and have harmed drinking water in Washington. The Board has failed to address these practices whatsoever, despite its clear regulatory mandate and authority to protect public drinking water. The Board should issue a new draft Rule outlining requirements to protect the public health from these three practices, which pose real and dangerous consequence to our public drinking water supplies – as well as air quality.

Finally, airborne disease, dust and odors from the keeping of animals also pose public health hazards and nuisance risks that are not sufficiently covered in the draft revisions. Other than setbacks from certain water sources and a requirement to store stockpiled waste so as to control odors and attraction of flies, rodents, and other vectors," (presumably, disease vectors?) the draft revision lacks any clear standards or requirements to protect the public from dust, disease, or odors, which may emanate from livestock themselves or from feeding or other areas. The Board should include requirements to control dust and odors from other areas of farm operations that pose a risk to public health.

4) The Board should consider climate impacts to public health from the keeping of animals, and the environmental justice impacts of the draft revisions.

Board mentions climate change in its Backgrounder just once, and not again. A deeper assessment of the climate impacts caused by the keeping of animals in Washington is both necessary and appropriate. The U.S. Environmental Protection Agency (EPA) estimated that agriculture contributed 11% of the United States' greenhouse gas (GhG) emissions in 2020²; the Washington State Department of Ecology attributed 15% of Washington's GhG emissions in 2017 to agriculture, industry, landfills, and fossil fuel production.³ Climate change has already resulted in more frequent and intense droughts, wildfires, dust storms, erosion, and floods in Washington; reduced glacial snowpack feeding our rivers and streams; acidification of the ocean and Puget Sound, and sea level rise threatens our coasts, wetlands and aquifers.

The Board is in a unique position to address the impacts of climate change on public health for the first time since the Rule was last substantively revised in 1936. With rule revisions coming so infrequently, now is the time to consider how the keeping of animals could – and must - be better managed to prevent or reduce climate impacts to communities throughout the State of Washington, consistent with Washington State's commitment to reducing GhG emissions to 45% below 1990 levels by 2030, 70% below 1990 levels by 2040, and 95% below 1990 levels and net zero emissions by 2050.

It is well known that the impacts of climate change hit communities of color and low-income communities first and hardest. While the Board of Health is not listed as one of the seven agencies required to comply with the HEAL Act; the Departments of Health, Agriculture and Ecology are. We encourage the Board of Health to coordinate with these sister organizations and opt in under the HEAL Act. Because of the strong environmental justice considerations implicated for rural and frontline communities by this Rule and any revisions to it, we also strongly urge the Board to conduct deeper community outreach and engagement around proposed Rule revisions with those whose health, lives, and families are most at risk from the Board's decision-making.

5) Additional concerns:

The Board should not limit "nuisance" to acts or omissions that harm, endanger, or interfere with the health or safety of another person. Such a definition is restrictively narrow and not reflective of current nuisance law. RCW 7.48 defines an actionable nuisance to include: "an obstruction to the free use of property, so as to essentially interfere with the comfortable enjoyment of the life and property, is a nuisance and the subject of an action for damages and other and further relief." We support the adoption of this definition within the Keeping of Animals rule.

We support the inclusion of a section regarding enforcement. The Rule is and should be enforceable, and language should be added to articulate when enforcement will occur. The public

² Sources of Greenhouse Gas Emissions | US EPA

³ Improving air quality & public health - Washington State Department of Ecology

deserves concrete assurance that documented nuisances and public health hazards will be abated within a certain amount of time.

While we do not agree with all recommendations outlined in the Backgrounder, we do agree with the recommendation to develop a practical, purposeful rule, by "defining the type and scale of regulated activities; steps and standards defining and documenting health hazards and nuisance; technical standards and practices to prevent and remedy problems; technical assistance and referral procedures; methods for property access, compliance, and enforcement." We feel the current draft revisions fall short.

Thank you for accepting and considering these comments. We hope that the Board adopts our suggestions to improve upon the draft revision and better protect public health in Washington. We look forward to working with you.

Sincerely,

Alyssa Barton Policy Manager Puget Soundkeeper Alliance _____

From: Karenlee@fairpoint.net Sent: 5/1/2022 10:35:42 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Private Animal Waste - Horses

External Email

As a horse owner, I am concerned about restrictions imposed by the Board of Health on animal waste. We are responsible horse owners who have 4 horses at our home of 6 acres in Snohomish. We bought a \$7700 Big Tex dump trailer to haul our manure out. Waste Management quoted a very high price for providing a bin to be kept at our property. Our manure pile has been at the same location since the 80s and is surrounded by neighboring pastures. But at some point those properties may be sold and contractors have been allowed to build nearly to the lot lines.

Horses bring money to the state, especially in populated areas. People with money choose to live near rustic areas where trees and horses can be found. Those people look for good hospitals, good roads, good security and spend money at the local level. They also own businesses that improve the local economy and employ people. I saw this in Southern California where there were pockets of horse ownership by the wealthy, and how it improved the surrounding middle class areas.

I need you to give careful consideration to avoid outlawing the ownership of horses by making restrictive ordinances where there are few complaints. I need you to craft rules that prevent contractors from building right up to a long existing manure pile, like you would for a large facility like a racetrack.

Please postpone the implementing of your draft proposal and allow a work/task force of stakeholders to convene and sort out concerns. The State of Washington is a great place to own a horse, and more and more, it is getting more expensive. Your ordinances could make it very expensive to own a horse.

Karen Lee

France Taylor Crossley

From: Teresa Crossley

Sent: 4/27/2022 7:22:49 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Livestock waste proposal

External Email

Dear Sir/ Madame,

The proposal concerning livestock manure is missing several important points of reason and enforcement. I won't address them all here but rather I will speak to some concerns I personally have.

As a horse owner, manure is removed from pasture on a regular schedule and collected in roll-offs and later transported to a composting facility.

All horses owners I know, do pretty much the same thing with manure from their ranch. A few compost on site.

Horses eat grass and seed (grain). That's all. No meat or meat byproducts. Their manure is not rife with the nasty germs which cause contamination to local waters from runoff. (Even if I did not practice the removal of manure from pasture it would not create an illness causing situation.)

Removal of manure from livestock trails or paved woodland trails is primarily a safety concern. Riders cannot carry a rake and bag with them. How on earth would something so cumbersome be safely attached to a horse? Flapping bags and side-banging rakes are just the ticket for an ambulance ride to hospital!!

Most trail riders really try and move their horses off to the side of ODT, but there is most commonly no dirt side or too narrow side area to be found!! Short sighted planning. This problem can be rectified by clearing a 6-8 foot wide path alongside the paved trail. Horses prefer walking on dirt to asphalt anyway. Not only is horse manure broken down and partially consumed by birds within a few days but it also does not contaminate, as previously stated.

Please don't make any decision with out full consideration! Establish a bipartisan comittee/ panel to include livestock owners for knowledgeable discussion of this subject.

Sincerely, Teresa Crossley

Sent from the all new AOL app for Android <a href="https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fplay.google.com%2Fstore%2Fapp.google.com%2Fstore%2Fstore%2Fstore%2Fapp.google.com%2Fstore%2Fstore%2Fstore%2Fstore%2Fstore%2Fstore%2Fstore%2Fstore%2Fstore%2Fstore%2Fstore%2Fstore%2

From: Glasoe, Stuart D (SBOH) Sent: 4/26/2022 11:28:42 AM To: DOH WSBOH Proposed Animal Waste Rule Subject: FW: WA Farm Bureau comments on BOH rulemaking - WAC 246-203-130 and SBEIS attachments\17E659F81C5F43AA image002.png attachments\CAA663693D35466E_WA Farm Bureau comment letter to PRDTOOL NAMETOOLONG.pdf Stuart Glasoe SBOH Health Policy Advisor 360-236-4111 From: Tom Davis <tdavis@wsfb.com> Sent: Tuesday, April 26, 2022 11:04 AM To: DOH WSBOH Proposed Animal Waste Rule <WSBOHProposedAnimalWasteRule@sboh.wa.gov> Cc: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>; Grellner, Keith (DOHi) <Keith.Grellner@kitsappublichealth.org>; Davis, Michelle (SBOH) <Michelle.Davis@sboh.wa.gov>; Warnick, Judy <judith.warnick@leg.wa.gov>; Short, Shelly <shelly.short@leg.wa.gov>; Dent, Tom <tom.dent@leg.wa.gov>; Schmick, Joe <joe.schmick@leg.wa.gov> Subject: WA Farm Bureau comments on BOH rulemaking - WAC 246-203-130 and SBEIS External Email Please find attached the WA Farm Bureau's comments regarding the Board of Health's proposed rulemaking related to WAC 246-203-130 and the SBEIS.

Sincerely,

Tom Davis

Director of Government Relations

Ensuring that our family farms continue to feed the world

"The people of this state do not yield their sovereignty to the agencies that serve them. The people, in delegating authority, do not give their public servants the right to decide what is good for the people to know and what is not good for them to know. The people insist on remaining informed so that they may maintain control over the instruments that they have created. . ."

RCW 42.56.030



To: Washington State Board of Health

Date: April 26, 2022

RE: Proposed rulemaking: WAC 246-203-130 Domestic Animal Waste

Dear Members of the Board of Health,

The Washington Farm Bureau is the state's largest general agricultural organization representing more than 47,000 member families statewide. We are a voluntary, grassroots advocacy organization representing the social and economic interests of farm and ranch families at the local, state and national levels. That is why Washington Farm Bureau is called the voice of agriculture.

In July 2019 we provided written comments expressing the serious concerns we had with staff-generated amendments to WAC 246-203-130 related to animal waste. We found the amendatory language was too broad, exceeded the scope outlined in the originating CR-101, created opportunities for frivolous and expensive lawsuits, duplicated existing state and federal laws addressing manure management on ranches and dairies, impacted the protections provided to our farmers under the state's Right to Farm laws and created create an unfunded mandate on local governments.

The March 2022 version of the draft rule represents an improvement over earlier drafts, but still has internal problems that need to be addressed if the rule is to be eventually approved.

Here are the remaining areas of concern:

Expands authority of LHO beyond provided statutory authorities.

o In subsection (1) of the proposed rule it states, "The purpose of this section is to establish standards for the prevention, control, and abatement of health-hazards-and-nuisance detrimental to human health related to the disposal of domestic animal waste..." (emphasis added). The proposed rule also states in (2)(g) that ""Nuisance" includes an act of omission that harms, endangers, or interferes with the health or safety of another person." (emphasis added). The inclusion of "safety" in this definition seeks to broaden the authority of local health officers far beyond what is provided in state law. Laws for worker safety are found in the authorizing statutes for Department of Labor & Industries.

Wrong WAC cited for livestock manure management.

o In subsection (3)(d)(i) it states that domestic animal waste from livestock that is collected and stockpiled for later use or disposal must be stored in a manner that controls odors and attraction of flies, rodents, and other vectors. In the "Significant Legislative Rule Analysis" presented to the BOH dated March 1, 2022, it states on page 3 under "Rationale for Determination" the following: "This standard incorporates by reference, without material

change, standards/rules of another Washington state agency. It incorporates requirements of the state solid waste rules, chapter 173-350 WAC, including WAC 173-350-320(6) regulating agricultural waste piles."

However, subsection (6) of WAC 173-35-320 is the wrong subsection since it is for "Piles used for storage or treatment – Permit requirements." In this section it does require the operator to ensure the facility is operated in a way as to control nuisance odors, as well as litter, dust, rodents, insects, etc. However, subsection (6) is the wrong section to cite since it addresses permitted activities. Agricultural wastes are addressed in subsection (2) under the title "Piles used for storage or treatment – Permit exemptions." This section includes the following language: "In accordance with RCW 70.95.305, facilities managing solid wastes in piles meeting the conditions listed in Table 320-A and the conditions of (a) of this subsection are exempt from solid waste handling permitting." (emphasis added). Table 320-A includes "Agricultural waste and on-farm vegetative wastes stored on farms." More importantly, subsection (2)(a)(ii) states that farms must "Manage the operation to prevent fugitive dust and the attraction of vectors..." WAC 173-350-100 further clarifies that subsection (2) is the appropriate language by defining agricultural waste to include livestock manure.

Please note that WAC 173-35-100 (2) does not include any requirement for odor control. Therefore, the addition of the requirement to control odor in your proposed rule has no legal or statutory standing and must be removed.

Violates the state's Right to Farm law.

The Washington State Right to Farm law states in RCW 7.48.305 that "agricultural activities conducted on farmland and forest practices, if consistent with good agricultural and forest practices and established prior to surrounding nonagricultural and nonforestry activities, are presumed to be reasonable and shall not be found to constitute a nuisance <u>unless the activity or practice has a substantial adverse effect on public health and safety.</u>" (emphasis added). The proposed rule before you has no qualifying language such as this. Rather it provides a broad requirement the stored waste must be managed to control odors, whether a public health issue has been determined to exist. Is the premise behind the proposed rule that any and all odors present a public health risk? In addition, nothing in your documentation cites any scientific research, or state and federal laws to substantiate this expansion of authority. Please also note that RCW 7.48.310, also part of the Right to Farm law, includes odors as a normal, acceptable condition related to agricultural activities.

Additional specificity required

o In subsection (4), the proposed rule states that "Before taking enforcement action the local health officer <u>must attempt</u> to communicate with the person who may be in violation of this section in order to explore the facts and, if the local health officer determines that a violation has occurred, <u>allow the person reasonable time</u> to correct the violation."

(emphasis added). We appreciate this language to allow for a conversation and the ability for additional information to be collected before enforcement action is taken. However, we are concerned that there are no details or specifics for what constitutes an "attempt to communicate" or what is a "reasonable time" to correct the violation. Additional specifics are needed to provide the required transparency for the overall process that will be used, and to increase justice and equity by ensuring all citizens are treated equally and that the rule is implemented in a uniform manner statewide.

Pasture livestock and Free-range grazing

- Earlier versions of the proposed changes to WAC 246-203-130 excluded both "pasture livestock" and "free-range grazing" from the requirements of this rule. The March 2022 version no longer specifically excludes pasture livestock. By what principles, proven health concerns, or medical or scientific findings did you justify the removal of pasture livestock from this exemption?
- For the purposes of this proposed rule, what do these two terms mean and what are the specifics or definitions that a LHO will use to determine whether livestock in a pasture fall into either of these two categories. Please note, that in general livestock producers do not use these terms. I encourage you to do a Google search for "free range grazing" and you will find pictures or written descriptions of pasture livestock. Free-range grazing is more popularly used as a synonym for organically raised rather than a rangeland management practice.

Inaccurate Small Business Economic Impact Statement

The data used to validate the SBEIS is woefully inadequate. Of the 1000 businesses identified to receive the cost survey, only 41 or 4.1 percent of the recipients responded. Worse yet, the USDA National Agricultural Statistics Service (NASS) has identified 12,656 farms in Washington that raise cattle or pigs. That means the BOH reached out to less than 8 percent of just the cattle and pig producers in the state identified by NASS. This does not even include farms that raise other types of livestock. This is clearly not enough data to adequately quantify the potential impacts of this proposed rule.

Given these serious issues, both technical and policy based, we request that the Board delay action on this proposed rule and create a work group with key stakeholders to help address the many problems that we and others have raised.

Sincerely,

Tom Davis

Government Relations Director

From: william sawaya

Sent: 4/21/2022 1:32:16 AM

To: DOH WSBOH, DOH Secretary's Office

Cc:

Subject: Thank You for Listening to the Citizens of WA State

External Email

Dear BOH Members: Thank you for listening to the concerns of us as citizens of Washington State and for voting to adopt the TAG's recommendation to not add the COVID-19 vaccine to Washington's list of required immunizations for child care and school entry at your April 13 virtual public meeting. We are confident that the emerging scientific data will continue to affirm your decision. Thank you for your thoughtful consideration in your role to protect the health of the children in our State. respectfully,

France Classe Church D (CDOII)

From: Glasoe, Stuart D (SBOH) Sent: 3/30/2022 11:27:14 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: FW: Keeping of Animals (WAC 246-203-130) proposed rule comment

Stuart Glasoe

SBOH Health Policy Advisor

360-236-4111

From: DOH WSBOH <WSBOH@SBOH.WA.GOV> Sent: Wednesday, March 30, 2022 8:45 AM

To: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>

Subject: FW: Keeping of Animals (WAC 246-203-130) proposed rule comment

Hi Stuart,

I let the customer below know that the email has been fixed, however I am forwarding this comment to you in case they decide not to email the animal waste inbox again.

Nathan Thai

Communications Consultant

Washington State Board of Health

Nathaniel.Thai@sboh.wa.gov <mailto:Nathaniel.Thai@sboh.wa.gov>

360-463-8928

Website

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2F&data=04%7C01, Facebook

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From: Emmett Wild <emmett@skagitcd.org <mailto:emmett@skagitcd.org> >

Sent: Tuesday, March 29, 2022 8:54 AM

To: DOH WSBOH < WSBOH@SBOH.WA.GOV < mailto: WSBOH@SBOH.WA.GOV > >

Subject: Keeping of Animals (WAC 246-203-130) proposed rule comment

External Email

I have tried to email my comments regarding the proposed rule change to the Keeping of Animals WAC but the email address listed on the DOH website (WSBOHProposedAnimalWasteRule@sboh.wa.gov <mailto:WSBOHProposedAnimalWasteRule@sboh.wa.gov>) keeps bouncing back as undeliverable. Please forward the below comments to the appropriate place and update the link on the DOH website.

I have several concerns about the proposed Keeping of Animals rule.

First, I am concerned that the term Nuisance is used as a regulatory metric when considering livestock waste. A nuisance is subject to an individual's personal thoughts or feelings, and as defined, is loose enough to continue to include personal preferences of community members to be used as the basis for a regulatory action. Complaints from people new to an agricultural area and/or by people with little knowledge or understanding of livestock management practices and stewardship consume immense amounts of public resources and agricultural producer time, often to investigate standard operating practices or legal manure applications as part of a cropland fertility management program.

Second, the use of a public health officer to investigate complaints creates unnecessary and potentially deleterious redundancies in the regulatory oversight framework for livestock producers. Agencies such as the Washington State Department of Agriculture's Dairy Nutrient Management Program have a robust dairy inspection and complaint response process, and Washington State Department of Ecology has many regional inspectors for non-point areas with a potential to discharge. Creating another office/agency from which manure management is to be regulated/supervised is redundant and risks hard-built working relationships between agricultural producers and existing regulators. It is not appropriate for a licensed physician to be investigating or enforcing land management and animal husbandry activities, as they lack the technical knowledge of these operations, the academic background, and the professional experience to fairly and reasonably execute WAC 246-203-130. The proposed rule should make clear that investigation and enforcement of livestock related complaints should be remanded to those more experienced and appropriate entities within the existing

regulatory oversight system.

Finally, rather than leave investigation to a singular public health officer or their delegate, a coordinated team of regulators and professional resource planners should assess the situation in question and provide a specific prescription to address the pollution risk. This will help to maintain existing working relationships with the person being investigated and ensure a standard and cohesive approach is taken to investigations. While individual health officers may come and go, the structure of a team and the inclusion of input from professional resource planners, will ensure equity and continuity in regulatory processes. Further, resource planners are trained to identify multiple viable alternative practices when working with a land manager, creating a more flexible, achievable, and success result.

Regards,

Emmett Wild

From: Kerri Stoehr

Sent: 4/29/2022 5:16:16 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: proposed policy for the Keeping of Animals.

External Email

I am asking you to postpone the draft proposal from June's hearing. Please allow a work group or task force to convene and sort out all of the concerns

Thank you Kerri Stoehr - C - DI - L - :

From: Garry Blankenship

Sent: 4/15/2022 11:26:41 AM

To: hcinfo.infosc@canada.ca,DOH WSBOH

Cc:

Subject: Proof of Vaccination Use

External Email

Good Day,

The current majority of COVID cases are among those injected with mRNA drugs. Further, that same group has "vaccine" compromised immune systems. I request the "vaccinated" be isolated, travel restricted and censored from public venues like restaurants, bars and large gathering events. Please advise me of progress to that end.

Sincerely,

Garry Blankenship

From: Samantha Janes

Sent: 3/31/2022 10:00:16 AM

To: DOH WSBOH Proposed Animal Waste Rule, Glasoe, Stuart D (SBOH)

Cc:

Subject: Comments WAC 246-203-103

External Email

To whom it may concern,

I recognize the Board of Health is an integral part of the governing process that keeps residents safe and protected from issues of which they may or may not be aware. It is with this in mind, I implore you to focus on matters that are not addressed by other government departments.

In regards to the proposed WAC 246-203-103, Domestic Animal Waste, it is in the best interest to the residents of the State of Washington that the Department of Agriculture and Department of Ecology are allowed to manage manure issues under their existing management plans without unnecessary conflict as your proposed WAC ruling will do.

Property owners are already subject to federal and state laws that regulate how commercial agriculture manure is managed. The proposed rules attempt to cover too broad of a range of animals. Placing new rulings across the board are unnecessary, unwise and impractical and have the potential of detrimentally affecting landowner's rights, pursuit of happiness and income.

Sincerely,

Samantha Janes

Samantha Janes 360-865-0949 cell

Owner, Paradise Love & Veggies www.paradiseloveveggies.com

https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.paradiseloveveggies.com%2F

From: Kathy Russo

Sent: 4/26/2022 5:40:18 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal waste

External Email

I respectfully request that the draft proposal from June's hearing be postponed. There are numerous concerns which should be addressed with all those who are affected by our current laws as well as these new proposals. Kathy Russo

Franci Cinnia Wana

From: Cinzia Wong

Sent: 4/28/2022 2:12:33 PM

To: DOH WSBOH

Cc:

Subject: Free Medicare Covid test kids

External Email

To Whom it may concern

My husband and I attempted to obtain our free Covid tests kits since April when we were notified by Medicare that we were eligible to receive them. We called several pharmacies in Vancouver, Washington and are running into nothing but obstacles. My sister on the other hand who lives in NYC is not having any problems in securing her Covid test kits or covid medication after she contracted Covid. She walked into a pharmacy and got them. She was in and out in ten minutes.

We called CVS and Rite Aide. They didn't seem to have a billing process in place. We also went into Walmart on Highway 99 when they informed us billing would not go through to Medicare. CVS said they didn't have any kits. Today we called Walgreens on NE 139th Street and were immediately discouraged from getting the test kits. We were immediately told by the pharmacy manager (a non pharmacist) that we would have to wait an hour and a half and should go into the store and not the drive through (we ere hoping to minimize our risk by not having to go into the store). And when we were eligible to receive masks we had the same problem with this Walgreens when they informed us they weren't participating and did not have any masks. do not

I hope I am wrong but wonder if pharmacies would rather sell the kits off the shelf instead of bill Medicare? Maybe this is easier.? Pharmacies in Vancouver WA doesn't seem to have a process in place for dispensing the Covid kits to the public as promised by Medicare care. As I understand it, the idea was the eliminate barriers so people could get tested. Based on our experience in securing free masks and the covid test kits, I have no faith in ever receiving antiviral covid medication in the event my husband and I qualify for and would need them.

We are totally disappointed and frustrated.

Cynthia Wong RN Charles Wong MD

From: Joan Fleming

Sent: 4/26/2022 11:48:51 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Proposed BOH Animal Waste Rule Comment

External Email

I am a homeowner on 5 acres just north of Rochester and have my horse on this property. I am also a member of Back Country Horsemen of Washington (BCHW) with whom your staff has met and otherwise communicated with along with Legislative representation and other interested organizations such as WA Cattlemen's Assoc., Farm Bureau, and likely others.

I agree with the concerns of BCHW such as mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officers) and more.

I compost my horse's manure and share the composted product with my neighbors for their garden as well as spreading it on my pastures twice a year. I am not adjacent to any streams, rivers, ponds, lakes, etc. The rule does not clearly allow composting and spreading livestock manure. Livestock are herbivores. Their manure does not have the pathogens that are present in carnivores such as dogs and cats. If this rule does not clearly state that the composting and spreading of livestock manure is allowed, it will be up to local health officers to make this judgment which will likely be different from jurisdiction to jurisdiction. If I will be required to annually remove my horse's manure, the cost will be prohibitive.

I, also, would ask that the BOH delay the Draft Policy proposal in June and that a work group/task force is formed to vet out these concerns.

Thank you for your consideration.

Joan Fleming Rochester, WA 360-273-8266 _____

From: Sue Davis

Sent: 5/2/2022 10:58:24 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Comments on Proposed Domestic Animal Waste Rule



attachments\2FFB3582C2784CD2_CommentstoWBOH.docx.pdf

External Email

Dear Washington Board of Health,

Please find attached my comments on the Proposed Domestic Animal Waste Rule WAC 246-203-130, submitted for your consideration.

Thank you.

Sue Davis

Subject: Comments on Proposed Animal Waste Rule, WAC 246-203-130

Dear Washington Board of Health,

The proposed domestic animal waste rule is unnecessary and redundant. Additionally, as written, it has the potential to impact operations that are not creating a nuisance or public health hazard and expose them to complaints and enforcement by people unfamiliar with agriculture operations and best management practices.

Washington State already has the authority to investigate and remediate water pollution through WAC 90.48. Under this WAC Department of Ecology has "...the jurisdiction to control and prevent the pollution of streams, lakes, rivers, ponds, inland waters, salt waters, water courses, and other surface and underground waters of the state of Washington." Under WAC 173-201A, Department of Ecology has the authority to set water quality standards and take actions to prevent degradation.

RCW 90.72 Shellfish Protection Districts gives counties the authority to create shellfish protection districts and programs to address water pollution where water pollution threatens the water quality of shellfish growing areas. RCW 90.72 states, "This program shall include any elements deemed appropriate to deal with the nonpoint pollution threatening water quality over shellfish tidelands, including, but not limited to, requiring the elimination or decrease of contaminants in stormwater runoff, establishing monitoring, inspection, and repair elements to ensure that on-site sewage systems are adequately maintained and working properly, assuring that animal grazing and manure management practices are consistent with best management practices (emphasis added), and establishing educational and public involvement programs to inform citizens on the causes of the threatening nonpoint pollution and what they can do to decrease the amount of such pollution."

Under RCW 70.05 individual counties already have the authority to adopt rules to address public health issues within their jurisdictions. The health officer has the power to, among others, take action to maintain health and sanitation supervision over the territory within his or her jurisdiction and prevent, control or abate nuisances which are detrimental to the public health which is the stated purpose of the proposed rule.

Finally, USDA Natural Resources Conservation Service has established best management practices (BMPs) for all aspects of agriculture, including livestock keeping and manure management. They and the local Conservation Districts across the state have education and financial programs to help land owners and livestock owners implement best management practices. The proposed rule as written does not mention or consider BMP's and has the potential to impact operations that are not creating a nuisance or public health hazard and those that are already using BMP's advocated by the expert agricultural agencies.

I urge you to postpone the draft proposal from the June hearing, and form a work group/task force of stakeholders and agriculture experts to consider the issue and concerns.

Thank you.

Susan Davis
Thurston County Resident and Livestock Owner

From: Azatullah Mayar Sent: 6/1/2022 9:28:12 PM To: DOH WSBOH

Cc:

Subject: My Public Comments

External Email

Azatullahmayar22@g.com <mailto:Azatullahmayar22@g.com>

From: Glasoe, Stuart D (SBOH) Sent: 3/30/2022 11:39:45 AM

To: DOH WSBOH Proposed Animal Waste Rule

Subject: FW: Animal Keeping rule

Stuart Glasoe

SBOH Health Policy Advisor

360-236-4111

From: Jean Gulden < jeangulden@gmail.com> Sent: Monday, March 28, 2022 8:10 PM

To: Glasoe, Stuart D (SBOH) <Stuart.Glasoe@sboh.wa.gov>

Subject: Animal Keeping rule

External Email

Dear Sir,

Though there are about 250,000 horses alone in Washington state, for this proposed rule, a bare1,000 surveys were mailed out to include all livestock and domestic facilities affected by the proposed law.

About .4%, yes, less than 1/2 of one percent, of those surveys were received back, only a small handful of which filled out any financial information. The conclusions drawn were that it must be fine and no cost because such a minute number filled in the financial information. I believe it is possible most did not return or did not complete these surveys because they have no idea how much such a rule would cost or the barest idea how it would be implemented. So in fact, there is no adequate 'cost analysis'.

Is such a rule even needed? Have we had public water or well contamination from livestock or pets? Has it caused any harm to humans? If a rule has worked for 100 years do we really need to change it? The rule gives no reason for updating other than its age no reports, no studies, no contaminations on a measurable scale, no current known health risk, no discussion of what diseases could or could not cross over. (As a non-water related practical example: Did you know lice are species specific so you can't 'catch' mange from a goat or horse or cow? I bet not.) Zero 'cost benefit' has been scientifically determined - though I am sure lawyers will make money.

Do we have staff to fairly and consistently handle this new rule? Is there training for this staff in various types of animal keeping? manure handling? fly control via fly predators and feed through? common and acceptable practices? composting rates? disease risk or lack thereof?

The potential for abuse of such a rule by ignorant, untrained health department workers spurred on by one neighbor or greedy developer in an entire area is HUGE.

This rule lacks any demonstrated need and fails to show how it might benefit our health or our water supply.

Jean Gulden

jeangulden@gmail.com <mailto:jeangulden@gmail.com>

509-499-2670

"Let love and faithfulness never leave you; bind them around your neck, write them on the tablet of your heart. Then you will win favor and a good name in the sight of God and man."

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From: Nancy the Soul Dancer Sent: 5/12/2022 1:12:25 PM To: DOH WSBOH

Cc:

Subject: Global Covid Summit live today 5-12-22

External Email

https://rumble.com/v14hkjj-episode-267-the-real-global-covid-summit.html

From: jjyy@earthlink.net Sent: 4/30/2022 2:33:29 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: postpone the draft proposa

External Email

Please postpone the draft proposal from June's hearing. We suggested they allow a work group/task force of stakeholders to convene and sort out the concerns.

From: Pskowski, Samantha L (SBOH)

Sent: 4/29/2022 11:36:00 AM

To: DOH WSBOH

Cc:

Subject: FW: Board Decision on Covid-19 vaccine

Samantha Pskowski (she/her/hers)

Washington State Board of Health

360-789-2358

From: Janet Young <antiejan@gmail.com> Sent: Friday, April 29, 2022 11:35 AM

To: Pskowski, Samantha L (SBOH) <samantha.pskowski@sboh.wa.gov>

Subject: Board Decision on Covid-19 vaccine

External Email

After listening to all of the Board and TAG meetings, I am pleased with the thorough consideration of the need or not to vaccinate children in our state for Covid-19. I appreciate all of the time each member had to spend in their decision making.

I am very appreciative of the Board's decision not to recommend mandatory Covid-19 vaccination for Washington's school children. This is a very serious subject that parents need to ponder and make a decision for their own children. We do not know the long-term effects of this vaccine in children.

Sincerely,

Janet M. Young

Maple Valley, WA

April 29, 2022

France Coath Winding

From: Scott Wiggins

Sent: 4/27/2022 9:26:38 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal waste

External Email

The short answer is that landowners are by far better custodians of thier property than any gov agency that has been proven over and over. As you come from your condo city life to legislate over landowners...remember your fact base is limited to fanatics that point to one or two examples an you mess with the 99.9% of folks that take care of this all the time and have for decades....we don't need or want your "help" unless you have a shovel. A better example is we have 4 horses and according to the county college folks we after 10years we should be under 8',of manure...the common sense truth is that every spring we drag a section of fencing over the pasture and it's gone and it enriches the soil...after all horse and cow manure is just digested grass.. that's it....pretty sure your targeting Seattle type stables and in your zest to have your name on a bill....miss legislate for the whole state...which is common for I-5ers....while my comments appear negative, what they are is watching decades of a handful of people messing with people that are very capable of handling thier own land, animals, and lives without state interference. And if you think outside the office...we been doing fine for 100 plus years...and now.....Thank you

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From: Tina Short

Sent: 4/29/2022 7:13:59 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Recommendation to Postpone Proposal CR-102/WSR 22-08-003 From June

Meeting

External Email

Good morning Washington State Board of Health,

I request you postpone the draft proposal (CR-102, Proposed Rule, as WSR 22-08-003 for WAC 246-203-130, Keeping of Animals) from the June 8, 2022 hearing.

Please allow a work group/task force of stakeholders to convene and sort through the concerns brought forward by the citizens of Washington state.

Tina Short Washington Citizen

May your troubles be less and your blessings be more, and nothing but happiness come through your door.

From: Deanna Clark

Sent: 4/30/2022 11:22:10 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: KEEPING OF ANIMALS memo



attachments\1BC644BB336D48E3_image001.gif

External Email

Dear State Board of Health,

There are many unresolved issues/concerns regarding the Keeping of Animals. Example of concerns are: mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officer), and more.

I am requesting that the draft proposal from the June meeting be postponed to allow a work group/task force of stakeholders to convene and vet out the concerns and make recommendations.

Please get back to me and let me know if you are honoring this request or have other avenues to resolve these issues. Thank you.

Deanna Clark

253.455.2073

From: Pat Engberg

Sent: 6/1/2022 1:25:17 PM

To: DOH WSBOH

Cc:

Subject: Covid shots

External Email

How ridiculous that the BOH refuses to acknowledge how ineffective & how dangerous the Covid shots have been. This is not about health & I have listened to several recent BOH webinars & all you talk about is how to deal with vaccine hesitancy rather than the multitude of other healthy options there are to stay healthy. You should all be fired!

Sent from my iPhone

From: ms n

Sent: 4/27/2022 10:46:19 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Postpone the drafted proposal

External Email

I'm requesting they postpone the draft proposal for the Animal WASTE Rule from June's hearing.

I suggested they allow a work group/task force of stakeholders to convene and sort out the concerns.

Nancy Wiest

From: SJ T

Sent: 4/14/2022 10:25:59 AM

To: DOH WSBOH

Cc:

Subject: BOH 13 Apr Mtg

External Email

Thank you for hosting a professional, well-run meeting. Though it was long, I found it informative and am glad I attended.

SammieJo Thirtyacre

From: Dr. Jack Gillette, DVM Sent: 5/2/2022 8:59:28 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: WAC 246-203-130 Keeping of animals.

External Email

I believe that the proposed rule should be postponed until a working group an examine it and work out any problems and/or flaws that are unforeseen at this time.

Please retain my E-mail for notifications of further actions.

Dr. Jack Gillette | DVM

Wildflower Veterinary Services

11425 221st ST SE

Graham, WA 98338

Phone (253) 847-1626

† Please Note Our New Email Address, Below:

† Email: HorseDoc@WildflowerVetLLC.com <mailto:horsedoc@wildflowervetllc.com>

Web: www.WildflowerVet.com

<a href="https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="http%3A%2Fwww.wildflowervet.com%2F&data="

From: Tracy Eisenhard

Sent: 5/12/2022 8:12:43 AM

To: DOH WSBOH

Cc:

Subject: Vote on April 13th

External Email

Please do NOT vote for vaccinations for COVID to be required for schools and day cares. It would be against the rights of parents to make their own medical choices for their children. It is proven to have negative impacts on children's health. It is proven that children are not at risk for extreme health risks due to COVID. It will greatly decrease enrollment in public school.

Thank You

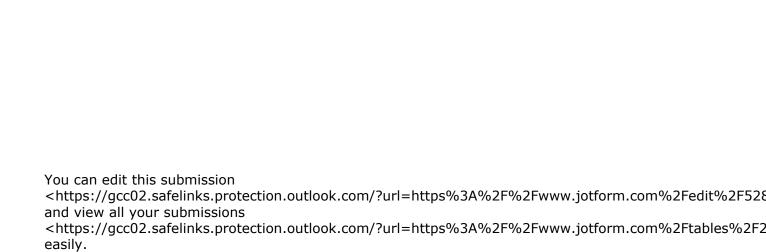
Tracy Eisenhard

Sent from Mail

https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fgo.microsoft.com%2Ffwlink%2F%forWindows

From: Jotform Sent: 5/13/2022 9:40:03 AM To: DOH WSBOH Cc:
Subject: Re: Stop The Child Vaccine Mandate Petition - Kathy Griffin
External Email
https://cdn.jotfor.ms/assets/img/logo2021/jotform-logo.png
Stop The Child Vaccine Mandate Petition
Name
Kathy Griffin
Email
stangc@gmail.com
Zip

, , , , 98513



Cell Phone Number

(98513)

5 0 11 12

From: Sally Kiger

Sent: 4/27/2022 9:54:16 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: URGENT Dept. of Health Keeping of Animals/Waste



attachments\8E3404EDC40C48DB_image001.gif

External Email

I have a small 1 acre hobby farm. I don't sell anything but I have ducks, chickens, horses and dogs. I have a small garden where I grow a lot of my own vegetables, I have a couple fruit trees.

I am very concerned about mixing equines in with domestic animals. Although they seem like pets they ARE NOT PETS in any way. They are working animals. They earn money (although not their keep) they take us hunting, up and down mountains for search and rescue missions, they work with us as parking lot attendants on occasion. When their world hits the fire, they REACT as a prey animal, barreling through fences, and running wild.

I definitely understand the issue with the waste they produce. We actively pick our bedding so we can compost their manure. The chickens do an excellent job of churning the piles, and I get beautiful soil for my garden.

I am asking that you put off ruling on this decision and make research groups/task force of all types of equine owners, Farmers, etc. to better understand how different decisions will effect the different users you have in this state.

Equines have always been farm animals and not pets. Just like cattle, Llama's, goats, and sheep. Everyone of those animals can technically be classified as both pets and farm animals.

Please do more research and reach out to all the communities.

Sally Kiger

AAS - Paralegal,

Paraeducator MMHS ext. 7761

C: (360) 749-1584

Kigersallyj@gmail.com <mailto:Kigersallyj@gmail.com>

From: Dean or Martha Effler Sent: 3/30/2022 4:56:46 AM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Keeping of Animals Rule/Domestic Animals Waste

External Email

The Washington State Department of Health is in the process of failing to protect the health and well being of thousands of state citizens. By changing the focus of the rule to domestic animals and leaving out the huge herds of dairy cows in Yakima County, the department is ignoring the largest source of ground water pollution in the state. In the past, the Washington State Department of Agriculture has wrongfully been given the responsibility to monitor the CAFO permits that are formulated by The Washington State Department of Ecology. They dedicate inadequate manpower to monitor manure management and virtually never do anything to protect ground water sources because their mission is to promote agriculture and not encumber it with added requirements. WSDA seems to be disinterested in truly protecting domestic wells that are contaminated with nitrate. The Washington State Department of Ecology seems to have great political pressure put on them to produce a weak CAFO permit. During the writing phase of the permit, Ecology employees sit down with environmentalists and smile at our suggestions regarding protection of aquifers, but when the final permit comes out it contains less than 5% of the recommendations of environmental groups. Instead the permit is so weak that ground water pollution is allowed to continue. This issue was brought to the Washington State Appeals Court and the court agreed. The court required that Ecology rewrite the permit with stronger measures that protected domestic wells.

Just remember how bad the situation is in the lower Yakima County. 20% of domestic wells are not drinkable because of nitrate. If you live one mile down current of large CAFOs, 60% of the wells are contaminated. This is true because manure lagoons are not lined with synthetic barriers and the industry produces so much manure that the manure is applied to lands that already has too much nitrogen in the soil. A federal court judge many years ago in Yakima County agreed with this assessment and required the owners of the four dairies to change their dairy practices.

So the citizens of Yakima County had only one agency left to protect their wells from contamination and that was the Washington State Department of Health. It looks like the Washington State Department of Health has taken the same road as the WSDA and Washington State Department of Ecology and is buckling in to the wealthy, politically influential dairy industry and is failing to do anything to protect the health of the citizens of the lower Yakima Valley. You should be ashamed of yourselves. Is there not one agency in state government that will stand with the common man and against the polluting dairy industry?

From: Tera Tagliabue

Sent: 6/3/2022 11:58:33 AM

To: DOH WSBOH

Cc:

Subject: Support citizens petition, agenda item 13

External Email

Dear BoH,

I want to voice my support for agenda item #13, the citizen petition for rulemaking. This calls for medical workers who administer EUA shots (such as all the Covid shots), and shots that lack completed Phase III clinical trials (all the Covid shots), to give potential recipients (or parent) specific information prior to vaccination so that fully informed consent (or refusal) can happen.

Thanks,

Tera Tagliabue

Sent from my iPhone

From: Glasoe, Stuart D (SBOH) Sent: 5/13/2022 10:51:46 AM To: DOH WSBOH Proposed Animal Waste Rule Cc:
Subject: FW: SBOH Keeping of Animals Rule clarification of comments
Stuart Glasoe
SBOH Health Policy Advisor
360-236-4111
From: McLain, Kelly (AGR) <kaardal@agr.wa.gov></kaardal@agr.wa.gov>
Sent: Friday, May 13, 2022 10:35 AM To: Glasoe, Stuart D (SBOH) <stuart.glasoe@sboh.wa.gov></stuart.glasoe@sboh.wa.gov>
Subject: SBOH Keeping of Animals Rule clarification of comments
To the State Board of Health,
I am writing to clarify the position of WSDA on the proposed rule for WAC 246-203-130,
the Keeping of Animals.
I would like to start by expressing my appreciation of your staff and their regular work with WSDA over the past four years on the content and intent of this rule. Subject matter
expertise from WSDA has been regularly sought and used in this process and that is evident in the proposed rule. WSDA stands neutral and not opposed to this rule as
drafted. Our comment letter was intended to provide for the record a robust accounting of the many programs and projects that touch on this topic, and our support of continued
collaborative approaches where possible. Please feel free to follow up if you have additional questions.
Sincerely,
Sincerery,
Kelly

Washington State Department of Agriculture

Kelly McLain | Legislative Liaison/Policy Advisor

Cell: 360.359.8091 | kmclain@agr.wa.gov <mailto:kmclain@agr.wa.gov>

From: Donahoe, Kaitlyn N (SBOH) Sent: 5/1/2022 6:04:37 PM

To: DOH WSBOH

Cc:

Subject: Fwd: CR 102 Domestic Animal Waste

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From: Jon Borcherding <jonreadsitall@protonmail.com>

Sent: Sunday, May 1, 2022 3:32:34 PM

To: Donahoe, Kaitlyn N (SBOH) <kaitlyn.donahoe@sboh.wa.gov>

Subject: CR 102 Domestic Animal Waste

External Email

The Washington State Board of Health has chosen a remarkably inopportune moment to address what is described as a long-standing issue.

With supply-chain problems and fertilizer shortages affecting the global food supply, many experts including the Biden Administration are predicting food shortages. The recent destruction of at least 12 major food production plants will likely also contribute to food shortages. The nation's railways are refusing shipment of nitrogen fertilizers during the current planting season. The FBI has just released a bulletin outlining the threat of cyber attacks against agricultural facilities. There is NO shortage of threats to America's food supply.

In addition to the looming specter of food scarcity is the alarming rate of inflation which disproportionately impacts the poor by making food more and more unaffordable.

In an effort to stave off shortages and hunger, many homeowners are engaging in small scale food production i.e., vegetable gardens, raising chickens, rabbits, pigs, goats, sheep, etc. Any new regulation that impedes the homestead production of vital food resources is bound to be met with fierce resistance.

In an era when we are experiencing global shortages of nitrogen fertilizers due to foreign conflict, it seems like a good time to review our attitudes about animal waste products and learn to treat them like the resource they are.

There are already laws on the books regarding proper animal husbandry and the Board would be well advised to address current problems within the existing framework. New rulemaking at this time is also bound to lead to increased cost to the taxpayer at a time when we are seeing record inflation.

Has the Board estimated the cost of enforcement of new proposals? Surely there is an awareness that commissioned law officers and search warrants will be necessary to investigate the disposition of animal waste on private property?

Also at issue is the credibility of the Health Department. It is not reasonable to expect homeowners to accept heavy handed regulation of traditional food production activities on their private property, particularly at a time when homestead food production may be key to survival. One can easily imagine the erosion of respect resulting from any attempt to use government force to hinder necessary farming activity.

I strongly urge the Washington State Board of Health to delay the Draft Policy proposal scheduled for June 2022. I believe it is in the best interests of all citizens that a work group or task force is formed to study the concerns of all stakeholders and advise the Board prior to the drafting or adoption of any new rules regarding the keeping of animals.

Sincerely,

Jon M. Borcherding

Roy WA

From: Daniel H

Sent: 6/1/2022 1:14:34 PM

To: DOH WSBOH

Cc:

Subject: Re: A. Clark Disciplinary Hearing



attachments\3DABE41884424895_image001.png

External Email

So now if Clark is resigning, will she be held accountable? Will the BOH that let her break the law be held accountable? What are you going to do about this???

On Fri, Apr 29, 2022 at 2:45 PM DOH WSBOH <WSBOH@sboh.wa.gov <mailto:WSBOH@sboh.wa.gov > wrote:

Hello,

An update on the Spokane Regional Health District hearing is available on our website - please visit: https://sboh.wa.gov/news/spokane-regional-health-district-hearing-update

< https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsboh.wa.gov%2Fnews%2Fspokanregional-health-district-hearing-

Best regards,

Phone: (360) 236-4110

Mailing Address: P.O. Box 47990, Olympia, WA 98504-7990

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- Subscribe

<mailto:wsboh@sboh.wa.gov?subject=Please%20Add%20My%20Name%20to%20the%20WSBOH%20Em

From: Daniel H <danielpvh@gmail.com <mailto:danielpvh@gmail.com> >

Sent: Friday, April 22, 2022 11:58 AM

To: DOH WSBOH <WSBOH@SBOH.WA.GOV <mailto:WSBOH@SBOH.WA.GOV> >

Subject: A. Clark Disciplinary Hearing

External Email

I'm wondering when the disciplinary/final hearing for Amelia Clark of SRHD is scheduled for? I'm also wondering if this meeting will be online and viewable by the public.

Many Spokane residents have been following this case diligently, and we could use more information about the official findings of the board.

Thank you,

Daniel Henry

Spokane, WA, 99212

From: tvreyo@gmail.com Sent: 4/26/2022 6:44:10 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Proposal regarding keeping/animal waste

External Email

It is my recommendation as a livestock and equine stock owner to oppose any legislation that has not been reasonably vetted by a task force, and especially this one. I request that the Board of health focus on more pressing issues- like junkies and hoarders, homeless and their abuse of public lands and rights of way. More focus should be put on public safety around the ever surpassing numbers of humans that are homeless. Regulating grazing animal Shit before regulating people feces is a waste of taxpayers money! Stop regulating the people who are obeying the law and start doing something about those that don't. This is a total overstep of the authority of the board of Health. Defer this proposal! I cannot believe we have people that even think up this stuff- and are using my hard earned dollars to do so!

Tanara Reynolds Landowner BCHW Multiple chapters Thurston County ____

From: Laura Brown

Sent: 4/26/2022 5:24:42 PM

To: DOH WSBOH Proposed Animal Waste Rule

Cc:

Subject: Animal Waste Rule

External Email

Hello, I am concerned about the proposed Animal Waste Rule. I feel that there are many issues/concerns that are unresolved.

Among the many concerns: mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officer), and more.

I ask that you please delay the Draft Policy proposal in June and that a work group/task force is formed to vet out concerns.

Thank you,
A concerned horse and goat owner,
Laura Brown
Arlington, WA

From: susan cole

Sent: 6/2/2022 9:56:05 AM

To: DOH WSBOH

Cc:

Subject: NO!!! to adding Covid shots (etc)to required inoculation list for students!

External Email

I am writing for the second time— I feel like this is "wack a mole" —

Keep this off of your "agenda" ALTOGETHER and ONCE AND FOR ALL!!! It has NO place due to lack of proper safety studies and due to the voluminous % of contraindications (and submitted VAERS reports)—that have presented themselves to our youth and people of ALL ages! The mere thought of this OVERREACH is an ABOMINATION of the worst kind as is any thoughts of adding chicken, monkey, or other new pox (etc)inoculations!!

I am however, in complete support of agenda item #13—WE THE CITIZENS in rule making!!

Thank you tor your time in reading this!

Susan Cole

Ex educator and grandmother of $4!\Box\Box$





Wings of Rescue is Sasking for donations.

June 13, 2020 at 3:44 PM · 🚱

What has 996 legs, weighs 7,151 pounds and flies? The answer is the 201 dogs 43 cats and 5 rabbits who flew on Wings of Rescue's flights over the last 48 hours! from overcrowded shelters in Texas, the Bahamas, Louisiana and Mississippi We want to send a huge thank you to IFAW and the Petco Foundation! Wings of Rescue will be back in the air over the next few weeks with flights from Louisiana, Texas, Oklahoma, Mississippi and Puerto Rico. Please support our rescue flights by donating online at

www.wingsofrescue.org//donate or by mailing a check to Wings of Rescue P.O. Box 21747, Seattle, Wa. 98111.

Another Ric Browde shipment caused deadly

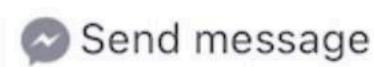








Wings of Rescue Nonprofit Organization





\$630 raised for Wings of Rescue

Subject: Comments on Proposed Animal Waste Rule, WAC 246-203-130

Dear Washington Board of Health,

The proposed domestic animal waste rule is unnecessary and redundant. Additionally, as written, it has the potential to impact operations that are not creating a nuisance or public health hazard and expose them to complaints and enforcement by people unfamiliar with agriculture operations and best management practices.

Washington State already has the authority to investigate and remediate water pollution through WAC 90.48. Under this WAC Department of Ecology has "...the jurisdiction to control and prevent the pollution of streams, lakes, rivers, ponds, inland waters, salt waters, water courses, and other surface and underground waters of the state of Washington." Under WAC 173-201A, Department of Ecology has the authority to set water quality standards and take actions to prevent degradation.

RCW 90.72 Shellfish Protection Districts gives counties the authority to create shellfish protection districts and programs to address water pollution where water pollution threatens the water quality of shellfish growing areas. RCW 90.72 states, "This program shall include any elements deemed appropriate to deal with the nonpoint pollution threatening water quality over shellfish tidelands, including, but not limited to, requiring the elimination or decrease of contaminants in stormwater runoff, establishing monitoring, inspection, and repair elements to ensure that on-site sewage systems are adequately maintained and working properly, assuring that animal grazing and manure management practices are consistent with best management practices (emphasis added), and establishing educational and public involvement programs to inform citizens on the causes of the threatening nonpoint pollution and what they can do to decrease the amount of such pollution."

Under RCW 70.05 individual counties already have the authority to adopt rules to address public health issues within their jurisdictions. The health officer has the power to, among others, take action to maintain health and sanitation supervision over the territory within his or her jurisdiction and prevent, control or abate nuisances which are detrimental to the public health which is the stated purpose of the proposed rule.

Finally, USDA Natural Resources Conservation Service has established best management practices (BMPs) for all aspects of agriculture, including livestock keeping and manure management. They and the local Conservation Districts across the state have education and financial programs to help land owners and livestock owners implement best management practices. The proposed rule as written does not mention or consider BMP's and has the potential to impact operations that are not creating a nuisance or public health hazard and those that are already using BMP's advocated by the expert agricultural agencies.

I urge you to postpone the draft proposal from the June hearing, and form a work group/task force of stakeholders and agriculture experts to consider the issue and concerns.

Thank you.

Susan Davis
Thurston County Resident and Livestock Owner



Explore opportunities to strengthen international infancing mechanisms to poister global health security preparedness.

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Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

2021 NTI-MUNICH SECURITY CONFERENCE TABLETOP EXERCISE PARTICIPANTS

EXERCISE CO-CHAIRS

Dr. Ernest J. Moniz Co-Chair and CEO Nuclear Threat Initiative Former U.S. Secretary of Energy

Ambassador Wolfgang Ischinger Chairman Munich Security Conference

PARTICIPANTS

Mr. Arnaud Bernaert

Head, Health Security Solutions **SICPA**

Dr. Beth Cameron

Senior Director, Office of Global Health Security and Biodefense

U.S. National Security Council

Mr. Luc Debruyne

Strategic Advisor to the CEO Coalition for Epidemic Preparedness

Dr. Ruxandra Draghia-Akli

Global Head

Johnson & Johnson Global Public Health R&D Janssen Research & Development

Dr. Chris Elias

President, Global Development Division Bill & Melinda Gates Foundation

Sir Jeremy Farrar

Director

Wellcome Trust

Dr. George Gao Director-General, Chinese Center for Disease

Control and Prevention (China CDC) Vice President, the National Natural Science Foundation of China (NSFC) Director and Professor, CAS Key Laboratory of

Pathogenic Microbiology and Immunology, Institute of Microbiology, Chinese Academy of Sciences Dean, Medical School, University of Chinese Academy of Sciences

Dr. Margaret (Peggy) A. Hamburg

Interim Vice President

Global Biological Policy and Programs, Nuclear

Threat Initiative

Former Commissioner of the U.S. Food and Drug

Administration

Ms. Angela Kane

Visiting Professor

Paris School of International Affairs (SciencesPo), and Tsinghua University

Dr. Emily Leproust

CEO and Co-Founder

Twist Biosciences

Dr. Elisabeth Leiss

Deputy Director of the Governance and Conflict

Division

German Corporation for International Cooperation (GIZ)

Ms. Izumi Nakamitsu

Under-Secretary-General and High Representative

for Disarmament Affairs

United Nations Office for Disarmament Affairs

Dr. John Nkengasong

Director

Africa Centres for Disease Control and Prevention

Sam Nunn

Founder and Co-Chair Nuclear Threat Initiative Former U.S. Senator

Dr. Michael Ryan

Executive Director

WHO Health Emergencies Programme

Dr. Joy St. John

Executive Director

CARPHA

Dr. Petra Wicklandt

Head of Corporate Affairs Merck KGaA

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Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

The discussion was organized into three sequential "moves" corresponding with scenario developments, followed by a roundtable discussion of broader biosecurity and pandemic preparedness issues. The stepby-step approach to revealing scenario developments reflected the limitations of information available to real-world decision makers, as well as the resulting uncertainty associated with a pandemic of unknown









May 2, 2022

Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

Dear WA BOH,

We are the Friends of Toppenish Creek from Yakima County.

Friends of Toppenish Creek is dedicated to protecting the rights of rural communities and improving oversight of industrial agriculture. FOTC operates under the simple principle that all people deserve clean air, clean water and protection from abuse that results when profit is favored over people. FOTC works through public education, citizen investigations, research, legislation, special events, and direct action.

People who live near animal feeding operations suffer from pollution of drinking water, air pollution, and infectious disease. State and local officials appear helpless to address this public health issue.

The magnitude of problems related to manure management has increased many fold since the introduction of concentrated animal feeding operations (CAFOs) to animal agriculture. Law makers who wrote rules to minimize health impacts from livery stables could not have envisioned storing animal excreta in million gallon lagoons or tossing it into the air to compost.

Remember that each mature milk cow excretes over 120 lbs of feces and urine every day. Multiply this by thousands of cows and that is a lot of manure.

A possible solution to this serious problem is to authorize citizen lawsuits against polluters when they cause or contribute to human illness or death. There is precedent for holding people responsible when they create conditions that harm others.

By herself, a woman whose husband dies from E-coli 0157 has little hope of winning against a multi-million dollar corporation that flaunts the law. But a change in the rules could make it possible to hold responsible parties accountable, by providing for cost recovery in litigation.

Thank you for seriously considering this option.

Sincerely,

Jean Mendoza

Executive Director, Friends of Toppenish Creek

3142 Signal Peak Road

White Swan, WA 98952

Rationale for Citizen Lawsuits to Protect Public Health from Manure Pollution

Legal Authority:

RCW 43.20.050

Powers and duties of state board of health—Rule making—Delegation of authority—Enforcement of rules.

- (2) In order to protect public health, the state board of health shall:
- (c) Adopt rules and standards for prevention, control, and abatement of health hazards and nuisances related to the disposal of human and animal excreta and animal remains;

WAC 246-203-130

Keeping of animals.

- (1) Any person, firm or corporation is prohibited from keeping or sheltering animals in such a manner that a condition resulting from same shall constitute a nuisance.
- (2) In populous districts, stable manure must be kept in a covered watertight pit or chamber and shall be removed at least once a week during the period from April 1st to October 1st and, during the other months, at intervals sufficiently frequent to maintain a sanitary condition satisfactory to the health officer. Manure on farms or isolated premises other than dairy farms need not be so protected and removed unless ordered by the health officer.
- (3) Manure shall not be allowed to accumulate in any place where it can prejudicially affect any source of drinking water.

Facts:

Human and animal excreta carry pathogens that endanger human and animal health. This is why we teach children to wash their hands after they go to the bathroom.

People who live in close proximity to animal feeding operations suffer from pollution of drinking water, air pollution and infectious disease.

The WA DOH and local health agencies do not monitor pollutants from AFOs, do not surveil for related health impacts, do not investigate complaints or health impacts, do not control discharges and emissions, and do not assist those whose health has been harmed. The WA State Dept. of Ecology and the WA State Dept. of Agriculture do very little, and specifically do not evaluate impacts on human health. It appears that the agencies lack the resources to characterize, assess, and evaluate health impacts from AFOs.

People who live in close proximity to AFOs spend millions of dollars out of pocket to purchase safe drinking water, address health impacts such as asthma, cardiovascular and lung disease, and infections.

Taxpayers spend millions of dollars to subsidize AFO actions to reduce and mitigate pollution, and to keep AFOs in business.

Cost benefit analysis of the proposed WAC 246-203-130 does not address costs to citizens, only costs to business.

Meeting legal standards to prove health hazards is expensive. In reality, a citizen who suffers illness or even death due to sloppy manure management does not have the financial resources to prove a cause and effect relationship. Public health agencies rarely make these connections.

Current WA rules and regulations do not protect citizens from the adverse health impacts of air and water pollution from improper manure management.

Proposed change to the Draft WAC 246-203-130:

One solution to this problem is provision for citizen lawsuits against those who damage public health. Such lawsuits could be allowed by provisions similar to those in the Clean Water Act. Citizens could seek injunctive relief (court orders prohibiting the pollution from continuing), civil penalties, and reimbursement of legal costs and attorneys' fees.

Proposed addition to WAC 246-203-130:

Any citizen may commence a civil action on his own behalf or on behalf of dependents:

- 1. Against any person, or collective of persons, who are alleged to discharge pollutants into a drinking water aquifer, or the ambient air in amounts that inflict illness or death.
- 2. Against responsible officials for failure to perform an act or duty to investigate negative health impacts from airborne or waterborne pollutants from animal manure.

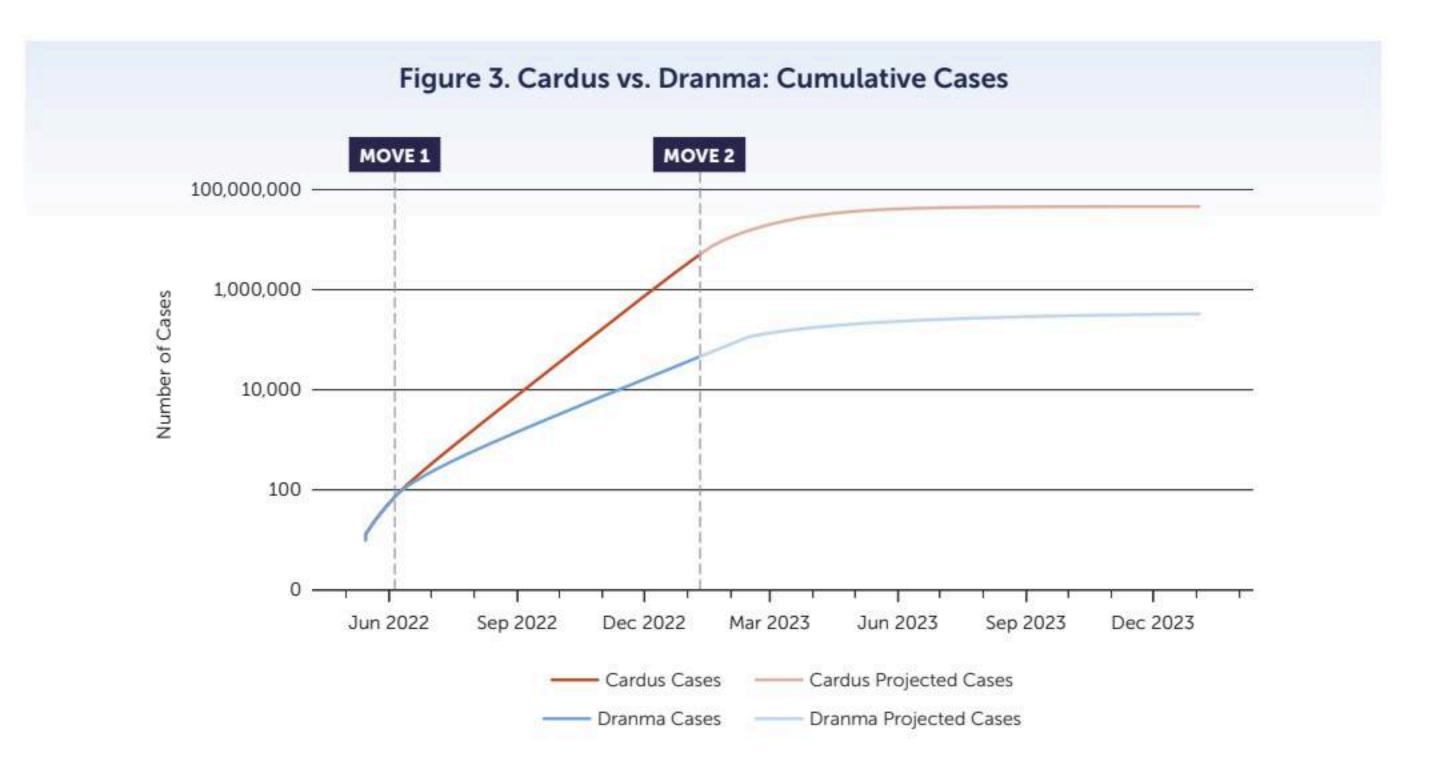
The court, in issuing any final order in any action brought pursuant to this section, may award costs of litigation (including reasonable attorney and expert witness fees) to any prevailing or substantially prevailing party, whenever the court determines such award is appropriate.

Arguments:

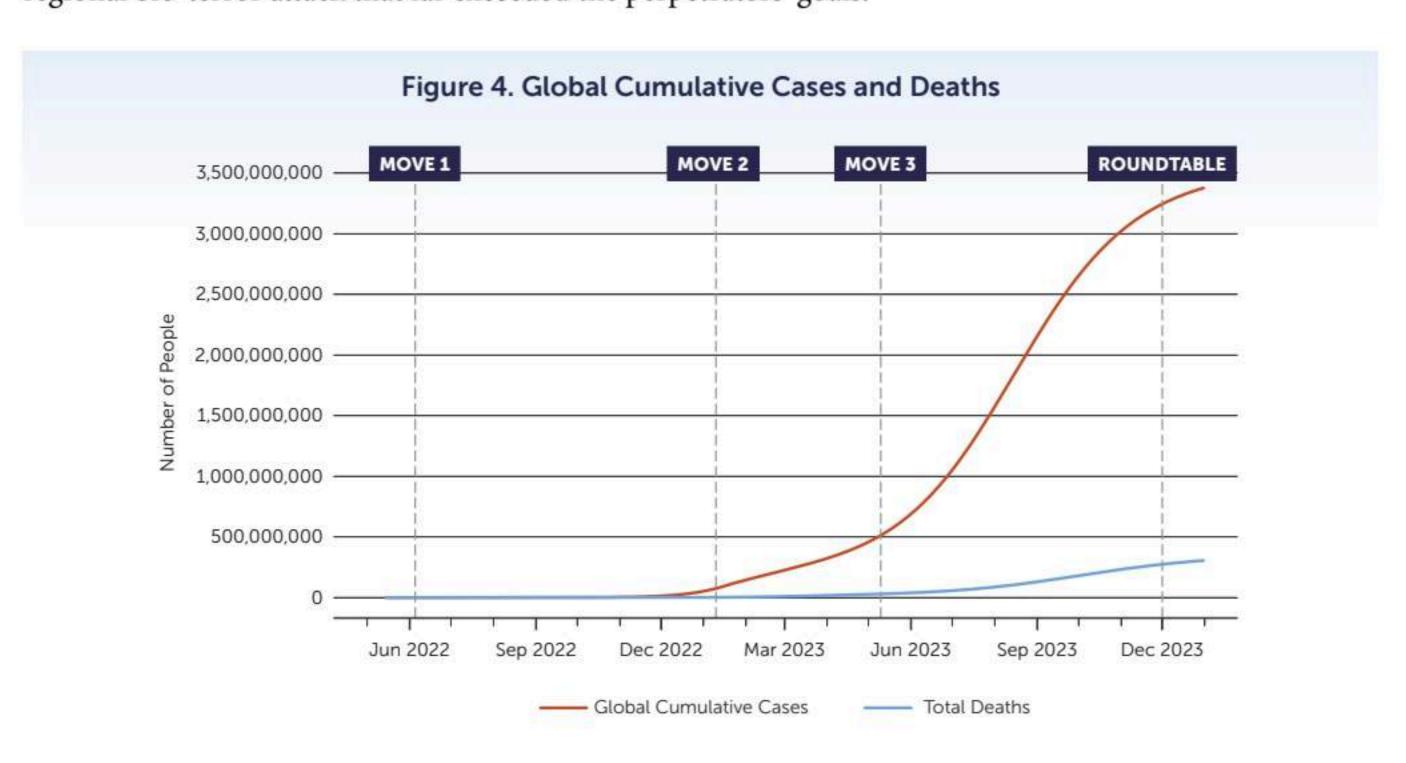
People who live near animal feeding operations where large amounts of manure are (mis)managed suffer documented adverse health impacts, but state and local officials appear helpless to change this situation. Citizen lawsuits could play a role in providing relief. Citizen lawsuits could realistically be undertaken if attorneys and expert witnesses could reasonably expect payment for their services.

Criteria for proving adverse health impacts will undoubtedly be subject to intense debate, but this obstacle is not insurmountable.

Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats



Move 3 (May 10, 2023) occurred 12 months after the initial outbreak, with more than 480 million cases and 27 million fatalities globally (Figure 4). At this stage, participants learn that the pandemic was caused by a regional bio-terror attack that far exceeded the perpetrators' goals.



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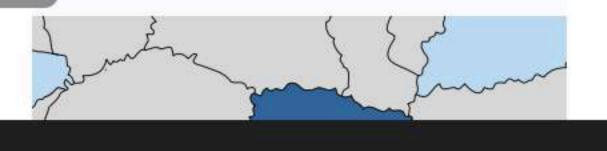
Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

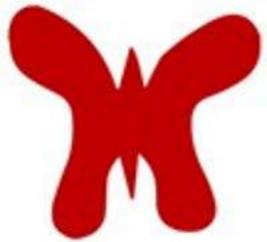
Specifically, Brinian intelligence reveals that the engineered monkeypox virus was developed illicitly at the fictional country of Arnica's leading institute for virology. Arnica (population 75 million) has a history of conflict with neighboring Brinia (see map in Figure 5). An independent Arnican terrorist group—the SPA—had worked with sympathetic laboratory scientists to

engineer a highly contagious, deadly pathogen and disperse it at crowded train stations in Brinia during the national holiday, when much of the population was travelling domestically and internationally.

Figure 5. Map of the Fictional Country of Brinia, the Geographic Origin of the Outbreak

The SPA had exploited the Arnican government's weak oversight of its bioscience research laboratories. SPA sympathizers working in Arnica's leading virology institute













5:38 ¼ 🚺 💓 ∞ R Pathogenic Microbiology and Immunology, Institute

of Microbiology, Chinese Academy of Sciences Dean, Medical School, University of Chinese Academy of Sciences

Dr. Margaret (Peggy) A. Hamburg

Interim Vice President Global Biological Policy and Programs, Nuclear Threat Initiative

Former Commissioner of the U.S. Food and Drug

Administration

Dr. Joy St. John **Executive Director** CARPHA

Dr. Petra Wicklandt

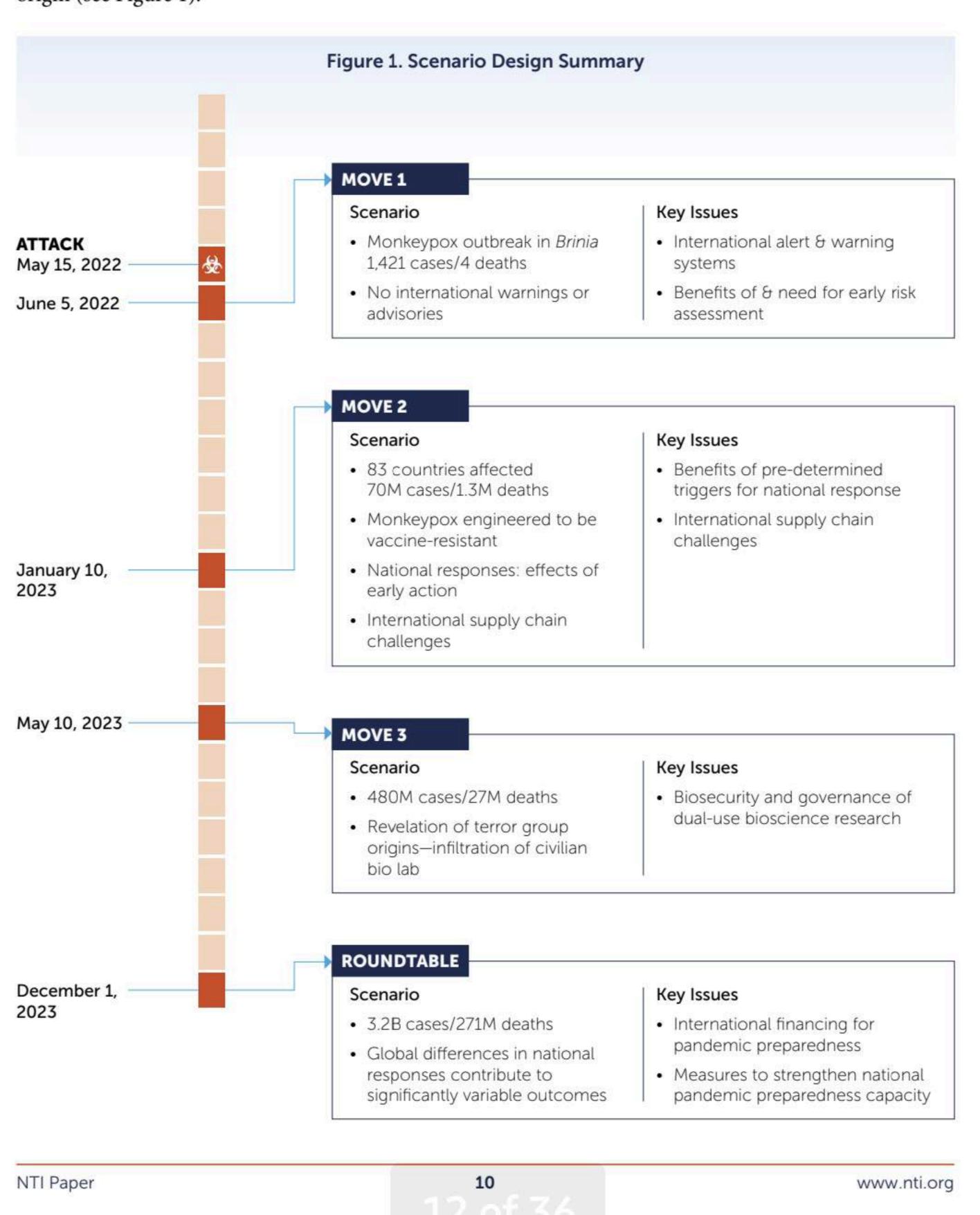
Head of Corporate Affairs Merck KGaA

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Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

The discussion was organized into three sequential "moves" corresponding with scenario developments, followed by a roundtable discussion of broader biosecurity and pandemic preparedness issues. The stepby-step approach to revealing scenario developments reflected the limitations of information available to real-world decision makers, as well as the resulting uncertainty associated with a pandemic of unknown origin (see Figure 1).



https://pubmed.ncbi.nlm.nih.gov/14720564/.

5:41 'I' 🚺 🎔 🚥 R 🍇

Estimated from moderate/hospitalized and severe cases to achieve case fatality rate. Inger K. Damon, "Status of Human Monkeypox: Clinical Disease, Epidemiology and Research," *Vaccine* 29 (2011): D54-D59, https://www.sciencedirect.com/science/article/pii/S0264410X1100524X.

¹⁸ WHO, "Monkeypox," 2019, https://www.who.int/news-room/fact-sheets/detail/monkeypox.

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Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

and leaves the R well above 1. The "Moderate" response countries open up in January, increasing R to approximately 2.2, before locking down in the summer of 2023 when the outbreak is undeniable. Finally, the "Effective" response countries lock down aggressively in February 2023 and keep R below 1 throughout the remainder of the exercise.

The combined global pandemic leads to more than three billion cumulative cases and more than 270 million deaths by the end of December 2023. At the peak of the pandemic, nearly 500 million individuals are infected at the same time, and there are 161 million people simultaneously in need of hospitalization.

The model was written in Python, with configuration and visualization through Jupyter notebooks.

Table B-2. Non-Pharmaceutical Intervention Dates and Impacts

Effective National Response					
Date	Beta	R			
6/6/22	0.09	1.89			
2/7/23	0.01	0.77			
Modest National Response					
Date	Beta	R			
6/6/22	0.08	1.75			
1/11/23	0.11	2.17			
3/11/23	0.08	1.75			
7/15/23	0.007	0.728			
Poor National Response					
Date	Beta	R			
6/6/22	0.15	2.73			
1/15/23	0.085	1.82			

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Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

33 of 36



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April 27, 2022

Washington State Board of Health

Re: CR-102, Proposed Rule, for WAC 246-203-130, Keeping of Animals.

Good Day

Upon review of the proposal rule, its claim that it "applies to everyone" is misleading. Areas that are incorporated and on municipal water systems already have regulations regarding livestock (i.e. quantity limits, type of livestock such as chickens, no roosters) and domestic pets (i.e. leash laws, waste disposal and quantity).

As such, it appears the target for this proposed rule would be imposed on unincorporated commercial and private acreage with livestock.

As such, we are of the opinion that this proposal should fall under the scope of authority of the Washington State Department of Agriculture (WSDOA). The Department of Agriculture's charter provides the agriculture community ensuring agricultural regulations are observed. They work extensively with commercial operations, but their responsibilities range from ensuring food safety to environmental protections for water quality.

They also have the ability to work with landowners who have self-imposed farm plans that regulate animal waste. These plans need to be grandfathered in.

If the regulations under the WSDOA for waste management are insufficient, those should be updated. They have the authority and infrastructure to mandate and enforce the waste management regulations.

The Conservation Districts who submitted this rulemaking petition, have a charter to engage people with voluntary actions that keep our air, water, soil, habitats, and **farmland healthy** for all. They should be petitioning the Department of Agriculture for changes, and not the Board of Health.

Regarding the regulations proposed these need to be more specific, if not they are subject to bias by those who implement and enforce.

For examples, Standards for non-livestock:

For landowners with acreage, would land owners be required to pick their field to find their pet animal waste for temporary storage in a water tight container and disposal?

Would land owners be required to fence property to prevent their cats and dogs from migrating to adjacent neighbors? What regulations would be in place, or recourse would a landowner have, if their neighbors deliberately allow, or walk their dogs or cats to defecate on their neighbor's property to avoid collection/containment/disposal? Would land owners be required to sign their property "No Trespassing" to prevent this?

Will domestic pets be restricted from retention ponds, creeks, and rivers on one's property?

Standards for stockpiled waste from livestock:

What is considered stockpiled? Collected for composting? piled up like an equine stud pile? concentrated defecation in a confinement area?

Is all livestock waste to be removed, including poultry, goats, sheep, ducks, if found within the 100 ft setback?

Will livestock waste need to be separated by omnivore (i.e pigs, ducks, chickens) or herbivore, to allow it to be composted? And if so, how is the omnivore waste to be disposed of?

Is composted livestock waste allowed to be spread on lands within the 100 ft setbacks?

What criteria will be set to determine if composted waste is acceptable to be spread? And who will make that determination?

What odors need to be controlled? Waste odors, composting odors, animal odors?

What constitutes odor control and at what distance and duration does a landowner have responsibility to control the odor? What device will be used to detect odors?

Will chicken compost be prohibited from being utilized?

Can you specify what pests are to be controlled?

These are just some of the clarifications needed before moving forward with regulation with the Department of Agriculture.

Thank you for your time,

Regards,

Jim and Cindy Reece

Small acreage land owner



World Health Organization 98, no. 9 (September 1 2020): 638-640, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7463189/.

- R.J. Jackson, A.J. Ramsay, C.D. Christensen, S. Beaton, D.F. Hall, & I.A. Ramshaw, "Expression of Mouse Interleukin-4 by a Recombinant Ectromelia Virus Suppresses Cytolytic Lymphocyte Responses and Overcomes Genetic Resistance to Mousepox," J Virol 75, no. 3 (February 2001):1205–10. doi: 10.1128/JVI.75.3.1205-1210.2001. PMID: 11152493; PMCID: PMC114026.
- WHO, "Monkeypox-Democratic Republic of the Congo," Disease Outbreak News (October 1, 2020), https://www.who.int/emergencies/disease-outbreak-news/item/monkeypox-democratic-republic-of-the-congo.

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Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

- Infected1. These are mild cases. After approximately one week, 50 percent of these cases worsen, and require hospitalization (the Infected2 state) whereas the remaining 50 percent progress to the Recovered state.
- Infected2. These are severe, hospitalized cases, requiring non-ICU treatment. After approximately
 one week, 40 percent of these cases worsen, thus requiring ICU (Infected3), whereas the remaining
 60 percent progress to the Recovered state.
- Infected3. These are critical cases requiring ICU treatment. This model assumes all deaths must first
 pass through this category. After approximately one week, 50 percent of these cases lead to death,
 whereas the remaining 50 percent progress to Recovered.
- Recovered. This compartment includes all individuals who have already had the disease (excluding those who died). For the purposes of the model, recovered individuals are considered to be immune from future infection.
- Deceased. Individuals who have died as a result of the disease. All deaths result from ICU
 (Infected3) cases and make up approximately 10 percent of all cases.

 γ_1 R recovered γ_3 $\beta_{I_1}I_1$ α S ICU susceptible mild infection hospitalized exposed (asymptomatic, (infectious) not infectious) D

infectious

Figure B-1. SEIR Compartmental Model Structure

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deceased

Environmental Health Services Division

401 Fifth Avenue, Suite 1100 Seattle, WA 98104-1818

206-263-9566 Fax 206-296-0189

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April 29, 2022

Washington State Board of Health,

Public Health – Seattle & King County thanks you for the opportunity to provide comments on this update of WAC 246-203-130.

We have copied the sections and added only the places we have comments or additions. Our comments or additions are the <u>underlined portions</u>, embedded or added to the text below.

(1) A person may not keep or shelter animals in such a manner that the domestic animal waste creates a nuisance or <u>direct and immediate</u> health hazard. The purpose of this section is to establish standards for the prevention, control, and abatement of health hazards and nuisance detrimental to human health related to the disposal of domestic animal waste, including handling and storage of domestic animal waste, as described in the subsection (3) of this section.

COMMENT: Add "direct and immediate" for consistency with proposed definition of health hazard, and to emphasize this quality of the health hazard.

(2) Definitions

(k) "Surface Water" means a body of water open to the atmosphere and subject to surface runoff including, but not limited to, lakes, ponds, streams, rivers, and marine waters, <u>as well as conveyance</u> systems to surface waters.

COMMENT: Suggested additional clause to include conveyance systems to surface waters.

(3) Unless a standard is superseded by a more stringent standard in federal, state, or municipal law, a person must meet the following standards in order to help prevent, control nuisances and health hazards related to the handling and disposal of domestic animal waste. Except for free-range grazing, livestock trails, trail riding, and other diffuse sources of domestic animal waste, a person must:

...

(c)(i) hold the waste in a <u>hard-sided</u> container <u>with a lid that closes securely to prevent access by animals and waste overflow from falling rain or snow if stored for more than one day prior to proper disposal;</u>

COMMENT: Replace "watertight" with, "a hard-sided container with a lid that closes securely so that animals cannot access it and it cannot overflow from falling rain or snow".

- (ii) Bag and dispose of the waste as solid waste, <u>unless waste is composted by a licensed compost</u> <u>facility per WAC 173-350-220.</u>
- (d) handle domestic animal waste from livestock that is collected and stockpiled for later use or disposal as follows:

- (ii) store the waste no longer than one year; ((and))
- (iii) Site the stockpile: ...[etc.]

COMMENT: Add new subsections (d)(iv) and (d)(v) as shown.

- (iv) Domestic animal waste from livestock shall be collected and stockpiled in accordance with an approved jurisdictional farm management plan; and
- (v) Domestic animal waste from non-herbivores may not be composted at the site of origin or used for land application.
- (4) The local health officer may investigate and enforce this section. Enforcement actions may include any proceeding within the local health officer's statutory authority. Before taking enforcement action the local health officer must attempt to communicate with the person who may be in violation of this section in order to seek compliance by education and prevention as a first step and, if the local health officer determines that a violation has occurred, allow the person reasonable time to correct the violation.

COMMENT: Replace "explore the facts" with "seek compliance by education and prevention as a first step..."

We appreciate the opportunity to provide comments. If you have questions or want clarification, please contact us.

Sincerely,

Darrell Rodgers-Richardson

Director, Environmental Health Services

Jarull A. Rodger

Public Health – Seattle & King County

<u>Darrell.Rodgers@Kingcounty.gov</u>



Washington State Legislature

April 27, 2022

Washington State Board of Health PO Box 47900 Olympia, WA 98504-7990 (360) 236-4110

RE: Keeping of Animals Rule

Dear Members of the Board of Health,

We have been working with staff to review the amendments to WAC 246-203-130 related to animal waste. We would like to offer some criticisms and suggestions.

First, we do not believe this rule change is necessary. We understand that the original rule was written long ago and in a very different world. However, these changes to this rule are overly burdensome and overly complex. The Department of Agriculture already does rulemaking regarding manure or nutrient management for large operations such as CAFOs or dairies in WAC 16-25 and 16-611. Additionally, RCW 7.48.305 exempts agricultural activities from regulations regarding noise and odor. This Rule change is out of time and out of place. It does not appear to take into consideration existing rules and regulations from other agencies.

Many counties, especially in Eastern Washington, have Right to Farm ordinances. The application of this new rule, if it goes forward, has the likelihood of placing rural people with animals in a position where they believe they are exempt from these rules and yet, they end up receiving needless complaints and potential prosecution. The rule is unclear where it applies. It would be better if this rule applied only within urban areas to carnivorous domestic animals. Including livestock creates complications that should be handled by the Washington Department of Agriculture, not the Department of Health. Pets such as cats and dogs have different manure than livestock animals like cattle and horses. The rule should address these differences.

The rule is unclear if it applies to all operations, whether commercial or private, urban or rural, and regardless of size. This places agricultural businesses at risk, especially as more urban people move into rural areas without having an effective understanding of best agricultural management practices. There is a higher risk to public health in urban areas from pet excreta such as cats and dogs. This is a very different issue than rural areas where there may be a few livestock animals on a couple acres or an actual livestock operation that is managed by the



Washington State Legislature

Department of Agriculture. This rule is overly broad and vague and open for abuse in a world where agriculture is continuously under attack by urbanites who do not appreciate or understand the rural way of life.

The local board of health is made of people from the community who better understand the community's needs. We acknowledge that there are bad actors who are creating actual problems. However, the details of such a rule as this should be determined by the local board of health in ways that align with local values and interests.

Finally, if there is to be an update of this rule, we ask that there be a broader stakeholder discussion. The Board has shown its willingness to be responsive to sticky problems such as this and incorporate a broader constituency into the conversation. This discussion should include nutrient management experts, agricultural interests as well as municipal interests, commercial pet operations, small scale farmers, local boards of health, as well as recreational groups like the Backcountry Horsemen and Women. This rule was rewritten from a narrow perspective without considering the wide-ranging consequences. Please reconsider your changes or, at a minimum, allow for a broad discussion about the formulation of a new rule.

Senator John Braun

Senate Republican Leader

20th Legislative District

Senator Judy Warnick

Senate Republican Caucus Chair

Jusy Warnes

13th Legislative District

Senator Shelly Short

Senate Republican Floor Leader

Mark I. Schoesles

7th Legislative District

Senator Mark Schoesler

9th Legislative District

Senator Jim Honeyford

Jim Honey ford

15th Legislative District



Washington State Legislature

Senator Curtis King

14th Legislative District

Senator Phil Fortunato

31st Legislative district

CC: Keith Grellner, RS, Chair

Bob Lutz, MD, MPH

Stephen Kutz

Elisabeth L. Crawford

Umair A. Shah, MD, MPH

Temple Lentz

Patty Hayes

Melinda Flores

Socia Love

Kelly Oshiro

Mr. Stuart Glasoe Washington State Board of Health 111 Israel Rd. SE Tumwater, WA 98501

Via email to: stuart.glasoe@sboh.wa.gov

Also submitted to: <u>WSBOHProposedAnimalWasteRule@sboh.wa.gov</u>

May 2, 2022

Re: 2022 Draft Rule Revisions, WAC 246-203-130 Keeping of Animals

Dear Mr. Glasoe:

Puget Soundkeeper Alliance (Soundkeeper) is a 501(c)(3) non-profit environmental organization, with a mission to protect and enhance the waters of Puget Sound for the health and restoration of our aquatic ecosystems and the communities that depend on them. Founded in 1984, Soundkeeper was a founding member of the international Waterkeeper Alliance and today has more than 8,000 members, supporters and volunteers who use and enjoy Puget Sound's marine waters and freshwater tributaries, for commercial, general recreational and aesthetic purposes. At least 176 of our supporters are known to live in communities with permitted Concentrated Animal Feeding Operation (CAFO) facilities; hundreds more live in communities with unpermitted agricultural operations.

Our constituents, and thousands of residents throughout the State of Washington, are at risk due to the failure of our State's regulatory agencies to protect against the public health and environmental harms caused by the keeping of animals. The Board of Health has a unique authority and responsibility to "assure safe and reliable public drinking water and to protect the public health" (RCW 43.20.050 (2)(a)), as well as to "adopt rules and standards for prevention, control, and abatement of health hazards and nuisance related to the disposal of human and animal excreta and animal remains" (RCW 43.20.050 (2)(c)), and to "adopt rules for the prevention and control of infectious and noninfectious diseases, including food and vector borne illness, and rules governing the receipt and conveyance of remains of deceased persons, and such other sanitary matters as may best be controlled by universal rule." (RCW 43.20.050 (2)(f).

We oppose the Washington State Board of Board of Health's (hereinafter "the Board's") draft rule revisions to WAC 246-203-130 (the "Rule"). We oppose the narrowing of the title and scope of the Rule from "Keeping of Animals" to "Domestic Animal Waste" as we disagree with the premise that the Board's unique authority is best suited to local regulation of smaller-scale activities and practices around animal waste alone. We are also concerned that the proposed revisions dramatically weaken existing public health and nuisance protections; fail to set adequate minimum standards to protect the public health from various risks associated with the

keeping of animals; and completely disregard the real and existential public health threat of climate change – a threat that can be exacerbated by the keeping of animals and, in particular, by industrial farm operations – or the environmental justice implications of the Rule.

1) The Board's regulatory authority and responsibility extends beyond managing animal waste.

The original Rule, entitled "Keeping of Animals", was broader than the newly proposed title of "Domestic Animal Waste." In its Background and Policy Recommendations document, ("Backgrounder") without sufficient explanation or supportive rationale, the Board recommends that "the rule should focus on practices involving the handling, storage, and disposal of livestock manure and other domestic animal waste generated on site (not off-site manure transport and use) that present a clear health, sanitation, or nuisance problem." (at 25). We disagree.

Keeping animals can produce dust, odors, haze, and noise; contribute to the spread of disease from both direct and indirect contact with animals and their waste; contaminate soils; contaminate drinking water, groundwater, and surface water; and contribute to climate change through the emissions of greenhouse gasses. These constitute public health hazards and nuisances. Air pollution, water pollution, drinking water contamination, disease, sickness, and disturbances caused by the keeping of animals results in diminished quality of health and life for those affected. The Board documents these risks and more over seven pages in its Backgrounder with more than 100 unique research articles on topics, but then fails to address most of these hazards in the draft revisions.

We object to the narrowing of the title to "Domestic Animal Waste", as an abdication of the Board's responsibility to protect the public health from the aforementioned health hazards and nuisances that may be unrelated to the management of animal waste alone. We also see no justification for excluding off-site manure transport and use from regulation, as the hazards and public health implications of animal waste do not simply disappear as it crosses a property line. We encourage the Board to leave the Rule title as-is, and to assess and regulate the health hazards and nuisance impacts of activities including but not limited to feeding, watering, housing, and transporting animals as well as their waste, to protect communities and public health.

2) The draft Rule revisions dramatically weaken or entirely removes existing public health and nuisance protections.

The Washington State legislature has directed the Board to regulate the storage of animal waste to protect human health. RCW 43.20.050 (2)(c)). The current Keeping of Animals rule reads as follows:

WAC 246-203-130 Keeping of animals.

¹ Keeping of Animals Background and Policy Recommendations of the Washington State Board of Health

- (1) Any person, firm or corporation is prohibited from keeping or sheltering animals in such a manner that a condition resulting from same shall constitute a nuisance.
- (2) In populous districts, stable manure must be kept in a covered watertight pit or chamber and shall be removed at least once a week during the period from April 1st to October 1st and, during the other months, at intervals sufficiently frequent to maintain a sanitary condition satisfactory to the health officer. Manure on farms or isolated premises other than dairy farms need not be so protected and removed unless ordered by the health officer.
- (3) Manure shall not be allowed to accumulate in any place where it can prejudicially affect any source of drinking water.

The draft revisions strike all of this language. In so doing, the Board proposes to dramatically scale back current requirements by:

- eliminating broad public protections against nuisances caused by the keeping or sheltering of animals (current section 1) and replacing them with protections limited to animal waste (draft section 1)
- eliminating strong stable waste collection, storage, and removal requirements (current section 2) and replacing them with vague and poorly defined requirements to collect animal waste containment areas (draft section 3a)
- striking strong and broad public health protections for drinking water (current section 3),

We object to the elimination of language in current sections 1-3 of the Rule. Rather than backsliding, the Board should build on these foundational protections, implementing clear minimum standards to ensure the intent of these protections is assured in light of modern-day animal-keeping practices and the extensive data on the nature and scope of the problems it causes - as documented in the Board's Backgrounder.

3) The draft revisions lack strong minimum standards to protect the public health.

The Board should build on the existing regulations to create stronger minimum standards to protect the public health and prevent nuisances. For example, the Board could keep existing sections 1 and 3 intact and expand section 2 to:

- articulate a more frequent waste removal requirement during the rainy season between October to April
- include all manure (not just "stable" manure, but any manure on any part of the premises)
- expand beyond "populous districts" to all districts, including "isolated premises"

Rural communities can be equally if not more susceptible to the public health risks posed by the keeping of animals.

The draft revisions lay out several requirements for livestock waste stockpiling in a new section (3(d)) excluding waste that is being composted and waste being stored in a lagoon. First, should the Board modify the existing Rule to authorize livestock waste stockpiling when the number of animals or quantity of waste renders it infeasible to cover and store the waste in an airtight container prior to removal (factory farms were likely not envisioned when the original Rule was promulgated in 1936), the Board should articulate which types of livestock operations are authorized to stockpile waste (how many animals, what size footprint, or how much waste?) and which types should continue the practice of keeping the waste in covered, airtight containers with requirements to periodically dispose of the waste.

Second, the Board should outline clear, science-based and appropriately tailored standards for the management of livestock waste by different operations that stockpile waste, adjusted to account for the size and type of operation (cattle, chicken, horse, etc.), the type of waste (liquid vs. solid), and site conditions (slope, soil-type, vegetation type and density, underground geology, hydrological features, etc.). A mature milk cow produces over 120 pounds of liquid feces and urine every day, whereas a horse produces 50 pounds of solid manure a day. The differences in consistency, chemical content, and quantity compounds with each additional animal, which surely necessitates different levels of protections for the public health.

Third, we are aware of no scientific basis why waste being composted or stored in a lagoon shouldn't also be managed as stringently – if not more stringently – than other stockpiles of waste. In fact, liquid manure being stored in a lagoon likely requires far more protections for the public health (greater setbacks from water sources, requirements to be stored in areas with a higher groundwater table, etc.). It is well known that lagoons leak.



image of manure lagoon



image of manure gun © USGS

The practices of storing excess livestock manure in large manure lagoons; transferring or selling livestock manure to third parties for use as fertilizer; and applying manure to fields as fertilizer (by both animal keepers and third parties – and often with a large "gun" or cannon that shoots the liquid waste over fields in a vast spray) are three modern practices that harm the public health and have harmed drinking water in Washington. The Board has failed to address these practices whatsoever, despite its clear regulatory mandate and authority to protect public drinking water. The Board should issue a new draft Rule outlining requirements to protect the public health from these three practices, which pose real and dangerous consequence to our public drinking water supplies – as well as air quality.

Finally, airborne disease, dust and odors from the keeping of animals also pose public health hazards and nuisance risks that are not sufficiently covered in the draft revisions. Other than setbacks from certain water sources and a requirement to store stockpiled waste so as to control odors and attraction of flies, rodents, and other vectors," (presumably, disease vectors?) the draft revision lacks any clear standards or requirements to protect the public from dust, disease, or odors, which may emanate from livestock themselves or from feeding or other areas. The Board should include requirements to control dust and odors from other areas of farm operations that pose a risk to public health.

4) The Board should consider climate impacts to public health from the keeping of animals, and the environmental justice impacts of the draft revisions.

Board mentions climate change in its Backgrounder just once, and not again. A deeper assessment of the climate impacts caused by the keeping of animals in Washington is both necessary and appropriate. The U.S. Environmental Protection Agency (EPA) estimated that agriculture contributed 11% of the United States' greenhouse gas (GhG) emissions in 2020²; the Washington State Department of Ecology attributed 15% of Washington's GhG emissions in 2017 to agriculture, industry, landfills, and fossil fuel production.³ Climate change has already resulted in more frequent and intense droughts, wildfires, dust storms, erosion, and floods in Washington; reduced glacial snowpack feeding our rivers and streams; acidification of the ocean and Puget Sound, and sea level rise threatens our coasts, wetlands and aquifers.

The Board is in a unique position to address the impacts of climate change on public health for the first time since the Rule was last substantively revised in 1936. With rule revisions coming so infrequently, now is the time to consider how the keeping of animals could – and must - be better managed to prevent or reduce climate impacts to communities throughout the State of Washington, consistent with Washington State's commitment to reducing GhG emissions to 45% below 1990 levels by 2030, 70% below 1990 levels by 2040, and 95% below 1990 levels and net zero emissions by 2050.

It is well known that the impacts of climate change hit communities of color and low-income communities first and hardest. While the Board of Health is not listed as one of the seven agencies required to comply with the HEAL Act; the Departments of Health, Agriculture and Ecology are. We encourage the Board of Health to coordinate with these sister organizations and opt in under the HEAL Act. Because of the strong environmental justice considerations implicated for rural and frontline communities by this Rule and any revisions to it, we also strongly urge the Board to conduct deeper community outreach and engagement around proposed Rule revisions with those whose health, lives, and families are most at risk from the Board's decision-making.

5) Additional concerns:

The Board should not limit "nuisance" to acts or omissions that harm, endanger, or interfere with the health or safety of another person. Such a definition is restrictively narrow and not reflective of current nuisance law. RCW 7.48 defines an actionable nuisance to include: "an obstruction to the free use of property, so as to essentially interfere with the comfortable enjoyment of the life and property, is a nuisance and the subject of an action for damages and other and further relief." We support the adoption of this definition within the Keeping of Animals rule.

We support the inclusion of a section regarding enforcement. The Rule is and should be enforceable, and language should be added to articulate when enforcement will occur. The public

² Sources of Greenhouse Gas Emissions | US EPA

³ Improving air quality & public health - Washington State Department of Ecology

deserves concrete assurance that documented nuisances and public health hazards will be abated within a certain amount of time.

While we do not agree with all recommendations outlined in the Backgrounder, we do agree with the recommendation to develop a practical, purposeful rule, by "defining the type and scale of regulated activities; steps and standards defining and documenting health hazards and nuisance; technical standards and practices to prevent and remedy problems; technical assistance and referral procedures; methods for property access, compliance, and enforcement." We feel the current draft revisions fall short.

Thank you for accepting and considering these comments. We hope that the Board adopts our suggestions to improve upon the draft revision and better protect public health in Washington. We look forward to working with you.

Sincerely,

Alyssa Barton Policy Manager Puget Soundkeeper Alliance



CONTACT INFORMATION (please type or print)

PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE

Print Form

In accordance with <u>RCW 34.05.330</u>, the Office of Financial Management (OFM) created this form for individuals or groups who wish to petition a state agency or institution of higher education to adopt, amend, or repeal an administrative rule. You may use this form to submit your request. You also may contact agencies using other formats, such as a letter or email.

The agency or institution will give full consideration to your petition and will respond to you within 60 days of receiving your petition. For more information on the rule petition process, see Chapter 82-05 of the Washington Administrative Code (WAC) at http://apps.leg.wa.gov/wac/default.aspx?cite=82-05.

Petitioner's Name Kenneth Harp								
Name of Organization								
Mailing Address 13920 93rd Avenue NE								
City Kirkland	State V	WA	Zip Code	98034				
Telephone 206.218.7639	Email <u>k</u>	ken 111@fastma	ail.com					
COMPLETING AND SENDING PETITION FORM								
 Check all of the boxes that apply. 								
Provide relevant examples.								
Include suggested language for a rule, if possible.								
 Attach additional pages, if needed. 								
 Send your petition to the agency with authority to adopt or administer the rule. Here is a list of agencies and their rules coordinators: http://www.leg.wa.gov/CodeReviser/Documents/RClist.htm. 								
INFORMATION ON RULE PETITION								
Agency responsible for adopting or administering the rule:								
☐ 1. NEW RULE - I am requesting the agency to adopt a new rule.								
The subject (or purpose) of this rule is:								
The rule is needed because:								
☐ The new rule would affect the following peop	ole or gro	oups:						

2. AMEND RULE - I am requesting the a	agency to change an existing rule.
List rule number (WAC), if known: WAC 24	46-105-070
I am requesting the following change:	See attached (Petition to Amend Rule letter, 2 pages).
This change is needed because:	Fully Informed Consent is not being obtained from Covid-19 mRNA product recipients (see attached Affidavit, 127 pages).
The effect of this rule change will be:	To ensure Fully Informed Consent is being obtained from recipients of products under EUA and/or which have not completed Stage III Clinical Safety Trials.
☐ The rule is not clearly or simply stated	ŧ
3. REPEAL RULE - I am requesting the	agency to eliminate an existing rule.
List rule number (WAC), if known:	
(Check one or more boxes)	
☐ It does not do what it was intended to	do.
☐ It is no longer needed because:	
☐ It imposes unreasonable costs:	
☐ The agency has no authority to make	this rule:
☐ It is applied differently to public and pr	ivate parties:
It conflicts with another federal, state, rule. List conflicting law or rule, if known	
It duplicates another federal, state or l List duplicate law or rule, if known:	ocal law or rule.
Other (please explain):	

Date: May 16th, 2022

To: The Washington State Board of Health Members

From: Kenneth Harp

Subject: Petition to Amend Rule modifying Chapter 245-105-070 WAC to include specific language requiring a health care provider administering immunizations to obtain Fully Informed Consent for any product or medical formulation that is Emergency Use Authorized and/or has not completed Stage III Safety Trials.

Dear Board of Health Members:

I am requesting the WA State Board of Health amend Chapter 245-105-070 WAC to include specific language requiring a health care provider administering immunizations to obtain Fully Informed Consent for any product or medical formulation that is Emergency Use Authorized and/or has not completed Stage III Safety Trials.

Current text of WAC 246-105-070:

"Duties of health care providers or organizations.

 A health care provider administering immunizations, or the organizations he or she works for, either public or private, shall furnish each person immunized, or their parent, with a medically verified immunization record containing information required by this chapter."

Recommended amendment to WAC 246-105-070 (recommend adding the following paragraphs):

"A health care provider administering immunization, or the organizations he or she works for, either public or private, shall ensure Fully Informed Consent is attained from each person immunized with an Emergency Use Authorized product and/or any product that has not completed Stage III Clinical Safety Trials, or their parent, consistent with the Nuremburg Code, UNESCO, the World Medical Association's Declaration of Helsinki, the guidelines of the Council for International Organizations of Medical Services and the International Covenant on Civil and Political Rights which categorically forbid medical experimentation without consent.

Information provided to each person to achieve informed consent shall at a minimum consist of:

- (1) The regulatory status of the *specific immunization lot number* they are receiving, including:
 - (a) Approval status (Emergency Use Authorized, fully FDA approved, other)
- (2) Clinical trial status. The current status of clinical trials for the immunization, including whether the clinical trial has been properly blinded or unblinded. If clinical trials are

- incomplete and/or being performed in parallel with deployment a notice shall be provided that clearly communicates this to the person immunized.
- (3) Whether or not the immunization prevents infection and transmission.
- (4) All known potential side effects, both short term and long term.
- (5) Clearly identification of the party(s) financially responsible for any adverse health impacts that may occur as a result of the immunization, including legal and lawful recourse for injuries sustained from any adverse events associated with the immunization and any legal indemnification afforded to the product manufacturer, the health care provider administering the immunization, or the organization he or she works for, either public or private.

A copy of the above information shall be provided to the product recipient prior to immunization."

Summary of rational for new WAC 246-105-070 paragraph:

I am requesting this rule amendment out of concern that Fully Informed Consent is not being obtained from Covid-19 mRNA product recipients, in particular that risks and benefits are not being fully and accurately communicated to product recipients. The attached "Health and Safety Concerns with respect to Covid-19 novel mRNA and recumbent DNA products" is provided as supporting information.

The proposed amendment to WAC 246-105-070 is necessary to ensure Fully Informed Consent is being obtained from product recipients. This rule modification would have a documentation recording and reporting impact on health care providers providing immunizations in WA State.

Respectfully,
Kenneth Harp

SWORN STATEMENT AND AFFIDAVIT

State of WASHINGTON

County of KING

PERSONALLY came and appeared before me, the undersigned Notary, the within named Kenneth Henry Harp III, who is a resident of King County, State of Washington, and makes this his Statement and General Affidavit upon oath and affirmation of research, personal knowledge and belief that the following matters, facts and things set forth are true and correct to the best of his knowledge:

RE: Health and Safety Concerns with respect to Covid-19 novel mRNA and recumbent DNA products

Given the historically very short timeframe in which the novel coronavirus mRNA therapies and recombinant DNA gene therapies were developed, the history of failed vaccine development attempts for SARS-CoV-1, MERS-CoV and related coronaviruses that resulted in increased sensitivity and enhanced disease, and the lack of extended clinical trial safety data, the long-term safety of these novel therapies cannot be currently ascertained.

Specifically of concern:

- 1) the rapid pace at which these novel mRNA therapy and recumbent DNA gene therapy products have been developed and rushed to market relative to traditional vaccine development timelines,
- 2) the specific and significant risk of resultant Antibody Dependent Enhancement (ADE) of disease and history of failed vaccine development attempts for SARS1, MERS and related coronaviruses,
- 3) the long-term risk of resultant auto-immune conditions,
- 4) the long-term risk of degradation of innate adaptive immune system response,
- 5) other potential long-term risks and adverse effects related to these novel medical products,
- 6) the incomplete and unblinded long-term Safety and Efficacy trials (scheduled to complete in 2023),
- 7) the de facto experimental nature of these products given (1) through (6) above,
- 8) the already high and growing number of short-term adverse reactions and deaths reported,
- 9) the growing incidence of myocarditis in young adults and athletes observed post-vaccination,
- 10) recent medical journal research indicating the SC2 spike protein alone may trigger adverse events,
- 11) recent medical journal research indicating these novel products do not prevent or reduce the transmission of, or infection from, the SARS-CoV-2 virus,
- 12) recent medical journal research indicating these novel products do not reduce SARS-CoV-2 viral load in the vaccinated,
- 13) the ambiguity surrounding the FDA approval announcement for the BioNTech "Corminaty" and Moderna "SpikeVax" products. These products are currently unavailable in Washington State. All currently available products, including the Pfizer BNT162b2 and Moderna mRNA-1273 product, are still under Emergency Use Authorization (EUA) and as such voluntary under Federal Law.

The long-term effects of these products are unknown. Until long term costs, benefits and side-effects are properly established, the mRNA and recumbent DNA gene therapy roll outs remain an experiment without conclusions. Coercing, mandating or manipulating people into medical experiments without fully informed consent is a crime.

Rapid pace in which these products were rushed to market relative to traditional development timelines

A typical vaccine development timeline takes 5 to 10 years, and sometimes longer, to assess whether the vaccine is safe and efficacious in clinical trials, complete the regulatory approval processes, and manufacture sufficient quantity of vaccine doses for widespread distribution. Figure 1 illustrates a typical vaccine development timeline (10 years) with the accelerated timeline (5 years) and Covid-19 product development timeline (1 year) for comparison. The rapid development timeline for these novel Covid-19 gene therapy "vaccines" is historically unprecedented.



Figure 1: Rapid development timeline of Covid-19 mRNA and recumbent DNA therapies [1]

These products do not meet the Revised Code of Washington State definition of a "Vaccine"

From the Revised Code of Washington State, RCW 70.290.010, Definitions Section (10), "Vaccine" "means a preparation of killed or attenuated living microorganisms, or fraction thereof, that upon administration stimulates immunity that protects against disease and is approved by the federal food and drug administration as safe and effective and recommended by the advisory committee on immunization practices of the centers for disease control and prevention for administration to children under the age of nineteen years." [2]

The available Pfizer, Moderna and Johnson & Johnson Covid-19 products do not meet the Washington State definition of a Vaccine. These products are not traditional vaccines, they are novel messenger RNA gene therapies [3] [4] and novel recombinant DNA gene therapies [5]. These novel technologies have never been tested nor deployed in a wide scale manner on human subjects. The clinical trial process is being performed in parallel with mass deployment. As such long-term risks and side-effects of these novel products are unknown.

Risk of Antibody Dependent Enhancement (ADE) and a History of Failed Vaccine Development

Antibody Dependent Enhancement of disease is, in simple terms, when vaccine-induced antibodies enhance, or make worse, a viral infection when exposed to the virus after being vaccinated for it.

Previous vaccine trials for SARS-CoV-1 and MERS-CoV (coronaviruses similar to SARS-CoV-2) never made it past pre-clinical (or animal test stage) due to ADE.

ADE is a response to the wild virus in which vaccinated people (or animals) experience a hyper-immune response which sets off dangerous inflammatory processes of disease – basically, and ironically, creating the worst outcome for the disease among those who have been vaccinated. At least 130 children died in the Philippines in 2017 when an experimental vaccine against Dengue fever resulted in an explosive immune ADE reaction killing the children when they were exposed to wild Dengue virus after vaccination [6]. The fiasco led to government health officers being indicted and the pharmaceutical giant, Sanofi, yanking its vaccine – but not before more than 800,000 children had already been given the shots and left in danger of an ADE response to the circulating virus.

"COVID-19 vaccines designed to elicit neutralising antibodies may sensitise vaccine recipients to more severe disease than if they were not vaccinated. Vaccines for SARS, MERS and RSV have never been approved, and the data generated in the development and testing of these vaccines suggest a serious mechanistic concern: that vaccines designed empirically using the traditional approach (consisting of the unmodified or minimally modified coronavirus viral spike to elicit neutralising antibodies), be they composed of protein, viral vector, DNA or RNA and irrespective of delivery method, may worsen COVID-19 disease via antibody-dependent enhancement (ADE). This risk is sufficiently obscured in clinical trial protocols and consent forms for ongoing COVID-19 vaccine trials that adequate patient comprehension of this risk is unlikely to occur, obviating truly informed consent by subjects in these trials." [7]

Multiple studies [8] had warned of the repeated failures and dangers of a coronavirus vaccine that created an ADE response when vaccinated individuals encountered a wild virus. Yet there is no evidence that the deaths from COVID-19 in the fully vaccinated have been investigated to determine if they suffered from an ADE response to a wild coronavirus" [9]. Current monitoring methods would treat ADE as a Covid infection leading to a self-reinforcing cycle. Monitoring protocols should be adjusted to screen for ADE.

"It is not clear from the CDC data if the people who have become seriously ill, including those who have died of COVID infection following vaccination, are not experiencing a known side-effect of coronavirus vaccination that was warned about before the rollout began: antibody dependent enhancement" [7].

"There are several vaccine types currently being pursued including mRNA, DNA, recombinant protein, virus-like particle, and live-attenuated or killed virus. With the potential exception of live, attenuated virus vaccines, the general goal is to induce adaptive immune response resulting in high-affinity IgG against S (spike) or N (nucleotide) viral capsid proteins. However, unless care is taken to modify the protein sequences to remove or inactivate regions highly associated with ADE, if this is even possible, we may produce vaccines that enhance, rather than protect against, severe SARS-CoV-2 infection. This could be particularly problematic in children, with their reduced risk of severe infection." [7]

Vaccine associated disease enhancement has been identified as an "important potential risk" in Pfizer's most recent Cumulative Analysis of Post-EUA Adverse Event Reports (BNT162B2), specifically identifying Vaccine-Associated Enhanced Disease (VAED) and Vaccine-Associated Enhanced Respiratory Disease (VAED) [10].

If ADE is occurring one result would be an increase in disease occurrence and/or severity among the vaccinated population. Note that an increase in disease occurrence coupled with non-sterilizing products (which do not prevent infection or transmission) places both vaccinated and unvaccinated at increased health risk.

"The specific and significant COVID-19 risk of ADE should have been and should be prominently and independently disclosed to research subjects currently in vaccine trials, as well as those being recruited for the trials and future patients after vaccine approval, in order to meet the medical ethics standard of patient comprehension for informed consent." [11]

The risks of Antibody Dependent Enhancement of disease should be fully disclosed as part of informed consent.

Risk of Resultant Autoimmune Conditions

The risk of long-term Auto-Immune conditions resulting from mRNA or recumbent DNA gene therapies or traditionally based COVID 19 vaccines is currently unknown.

For reference, an antigen is a substance (protein) that causes the immune system to produce antibodies and trigger an immune response. An epitope is a localized region on the surface of an antigen capable of eliciting an immune response and of combining with a specific antibody to counter that response. Full-length SARS-CoV-2 spike proteins contain epitopes that have moderate to strong cross-reactivity with a variety of human tissues.

"Razim et al. concluded that before considering a protein as a vaccine antigen, special care should be taken in analyzing the sequence of tissue cross-reactive epitopes in order to avoid possible future side effects. We agree with Razim et al., and we feel that our own findings that 21 out of 50 (human) tissue antigens had moderate to strong reactions with the SARS-CoV-2 antibodies are a sufficiently strong indication of cross-reaction between SARS-CoV-2 proteins and a variety of tissue antigens beyond just pulmonary tissue, which could lead to autoimmunity against connective tissue and the cardiovascular, gastrointestinal, and nervous systems." [12]

"At the moment, scientists are frantically trying to develop either a definitive cure, neutralizing antibodies, or a vaccine to protect us from contracting the disease in the first place, and they want it right now. We must consider that finding a vaccine for a disease may normally take years. There are reasons for all the precautions involved in developing a vaccine, not the least of which are unwanted side-effects. In light of the information discussed above about the cross-reactivity of the SARS-CoV-2 proteins (antigens) with human tissues and the possibility of either inducing autoimmunity, exacerbating already unhealthy conditions, or otherwise resulting in unforeseen consequences, it would only be prudent to do more extensive research regarding the autoimmune-inducing capacity of the SARS-CoV-2 antigens." [12]

The Pfizer BNT162B2, Moderna mRNA-1273 and Janssen Ad26.COV2.S products all encode for and produce full-length spike proteins.

The risk of resultant autoimmune conditions should be fully disclosed as part of informed consent.

Risk of degradation of innate immune system response

Recent medical research findings reveal that the SARS-CoV-2 full-length spike protein may impair adaptive immunity by inhibiting DNA damage repair. The Pfizer BNT162B2, Moderna mRNA-1273 and Janssen Ad26.COV2.S products all encode for and produce full-length spike proteins.

"Adaptive immunity plays a crucial role in fighting against SARS—CoV—2 infection and directly influences the clinical outcomes of patients. Clinical studies have indicated that patients with severe COVID—19 exhibit delayed

and weak adaptive immune responses; however, the mechanism by which SARS—CoV—2 impedes adaptive immunity remains unclear. Here, by using an in vitro cell line, we report that the SARS—CoV—2 spike protein significantly inhibits DNA damage repair, which is required for effective V(D)J recombination in adaptive immunity." [13]

"Our findings provide evidence of the spike protein hijacking the DNA damage repair machinery and adaptive immune machinery in vitro. We propose a potential mechanism by which spike proteins may impair adaptive immunity by inhibiting DNA damage repair. Although no evidence has been published that SARS—CoV—2 can infect thymocytes or bone marrow lymphoid cells, our in vitro V(D)J reporter assay shows that the spike protein intensely impeded V(D)J recombination. Consistent with our results, clinical observations also show that the risk of severe illness or death with COVID—19 increases with age, especially older adults who are at the highest risk. This may be because SARS—CoV—2 spike proteins can weaken the DNA repair system of older people and consequently impede V(D)J recombination and adaptive immunity. In contrast, our data provide valuable details on the involvement of spike protein subunits in DNA damage repair, indicating that full—length spike—based vaccines may inhibit the recombination of V(D)J in B cells, which is also consistent with a recent study that a full—length spike—based vaccine induced lower antibody titers compared to the RBD—based vaccine. This suggests that the use of antigenic epitopes of the spike as a SARS—CoV—2 vaccine might be safer and more efficacious than the full—length spike. Taken together, we identified one of the potentially important mechanisms of SARS—CoV—2 suppression of the host adaptive immune machinery. Furthermore, our findings also imply a potential side effect of the full—length spike—based vaccine." [13]

Note that a degradation of the innate immune system response may place the product recipient at increased risk for disease beyond Covid-19.

The risk of degradation of innate immune system response should be fully disclosed as part of informed consent.

Risk of Myocarditis, Pericarditis and/or other Acute Coronary Syndrome conditions

A recent JAMA study has shown that the 7-day risk of myocarditis following mRNA COVID vaccination is around 133 times greater than the background risk in young males [14].

The study, conducted by researchers from the U.S. Centers for Disease Control (CDC) as well as from several U.S. universities and hospitals, examined the effects of vaccination with products manufactured by Pfizer-BioNTech and Moderna. The study's authors used data obtained from the CDC's VAERS reporting system which were cross-checked to ensure they complied with CDC's definition of myocarditis; they also noted that given the passive nature of the VAERS system, the number of reported incidents is likely to be an underestimate of the extent of the phenomenon.

Table 2. Reports to VAERS After mRNA-Based COVID-19 Vaccination That Met the CDC's Case Definition for Myocarditis Within a 7-Day Risk Interval per Million Doses of Vaccine Administered

	Reported cases of myo	carditis within a 7-d risk interval p	per million doses of vaccine ad	ministered (95% CI) ^a	Expected cases of myocarditis	
	Vaccination with BNT162b2		Vaccination with mRNA-	in a 7-d risk interva		
	First dose	Second dose	First dose	Second dose	(95% CI)°	
Males						
Age group, y						
12-15	7.06 (4.88-10.23)	70.73 (61.68-81.11)			0.53 (0.40-0.70)	
16-17	7.26 (4.45-11.86)	105.86 (91.65-122.27)			1.34 (1.05-1.72)	
18-24	3.82 (2.40-6.06)	52.43 (45.56-60.33)	10.73 (7.50-15.34)	56.31 (47.08-67.34)	1.76 (1.58,1.98)	
25-29	1.74 (0.78-3.87)	17.28 (13.02-22.93)	4.88 (2.70-8.80)	24.18 (17.93-32.61)	1.45 (1.21-1.74)	
30-39	0.54 (0.20-1.44)	7.10 (5.26-9.57)	3.00 (1.81-4.97)	7.93 (5.61-11.21)	0.63 (0.54.0.73)	
40-49	0.55 (0.21-1.48)	3.50 (2.28-5.36)	0.59 (0.19-1.82)	4.27 (2.69-6.78)	0.78 (0.67-0.90)	
50-64	0.42 (0.17-1.01)	0.68 (0.33-1.43)	0.62 (0.28-1.39)	0.85 (0.41-1.79)	0.77 (0.68-0.86)	
≥65	0.19 (0.05-0.76)	0.32 (0.10-1.00)	0.18 (0.05-0.72)	0.51 (0.21-1.23)		
Females		""				
Age group, y						
12-15	0.49 (0.12-1.98)	6.35 (4.05-9.96)			0.17 (0.11-0.29)	
16-17	0.84 (0.21-3.37)	10.98 (7.16-16.84)			0.42 (0.27-0.66)	
18-24	0.18 (0.03-1.31)	4.12 (2.60-6.54)	0.96 (0.31-2.96)	6.87 (4.27-11.05)	0.38 (0.30-0.49)	
25-29	0.26 (0.04-1.84)	2.23 (1.07-4.69)	0.41 (0.06-2.94)	8.22 (5.03-13.41)	0.48 (0.35-0.65)	
30-39	0.72 (0.32-1.60)	1.02 (0.49-2.14)	0.74 (0.28-1.98)	0.68 (0.22-2.10)	0.47 (0.39-0.57)	
40-49	0.24 (0.06-0.97)	1.73 (0.98-3.05)	0.18 (0.02-1.25)	1.89 (0.98-3.63)	0.89 (0.77-1.04)	
50-64	0.37 (0.15-0.88)	0.51 (0.23-1.14)	0.65 (0.31-1.36)	0.43 (0.16-1.15)	1.00 (0.89-1.13)	
≥65	0.08 (0.01-0.54)	0.35 (0.13-0.92)		0.26 (0.08-0.81)		

Figure 2: Reports to VAERS after mRNA-Based Covid-19 Vaccination That Met the CDC's Case Definition for Myocarditis Within a 7-day Risk Interval per Million Doses of Vaccine Administered [14]

From Figure 2 above (Table 2: Reports to VAERS after mRNA-Based Covid-19 Vaccination that met the CDC's case definition for myocarditis withing a 7-day risk interval per million doses of vaccine administered)

Males, Age Group 12-15, vaccination with BNT162b2 (Pfizer):

- Second Dose: 70.73 (Reported cases of myocarditis per million doses administered)
- Expected Cases: 0.53 (background rate of myocarditis in this age/sex group, 2017-2019)

70.73/0.53 = 133.45 or 133 times the background rate

A recent study suggests that the presence of the full-length spike protein alone may be sufficient to cause cardiovascular damage.

"It was found that the treatment of cultured primary human pulmonary artery smooth muscle cells (SMCs) or human pulmonary artery endothelial cells with the recombinant SARS-CoV-2 spike protein S1 subunit is sufficient to promote cell signaling (cellular changes) without the rest of the viral components [15]. Furthermore, our analysis of the postmortem lung tissues of patients who died of COVID-19 has determined that these patients exhibited pulmonary vascular wall thickening, a hallmark of pulmonary arterial hypertension (PAH) [15]. Based on these results, we proposed that the SARS-CoV-2 spike protein (without the rest of the viral

components) triggers cell signaling events that may promote pulmonary vascular remodeling and PAH as well as possibly other cardiovascular complications [15], [16]." [17]

"Recent observations suggest that the SARS-CoV-2 spike protein can by itself trigger cell signaling that can lead to various biological processes. It is reasonable to assume that such events, in some cases, result in the pathogenesis of certain diseases.

Our laboratory only tested the effects of the SARS-CoV-2 spike protein in lung vascular cells and those implicated in the development of PAH. However, this protein may also affect the cells of systemic and coronary vasculatures, eliciting other cardiovascular diseases such as coronary artery disease, systemic hypertension, and stroke. In addition to cardiovascular cells, other cells that express ACE2 have the potential to be affected by the SARS-CoV-2 spike protein, which may cause adverse pathological events. Thus, it is important to consider the possibility that the SARS-CoV-2 spike protein produced by the new COVID-19 vaccines triggers cell signaling events that promote PAH, other cardiovascular complications, and/or complications in other tissues/organs in certain individuals (Figure 3). We will need to monitor carefully the long-term consequences of COVID-19 vaccines that introduce the spike protein into the human body." [17]

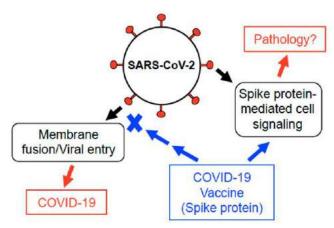


Figure 3: Possible actions of the SARS-CoV-2 spike protein. [17]

"The SARS-CoV-2 spike protein of the intact virus targets ACE2 of the host cells to facilitate the membrane fusion and the viral entry. The SARS-CoV-2 spike protein also elicits cell signaling in human cells [15], [18]. COVID-19 vaccines introduce the spike protein into the human body. In addition to eliciting an immune response that suppresses the viral entry, the spike protein produced by the COVID-19 vaccines may also affect the host cells, possibly triggering adverse events. Further investigations addressing this possibility are warranted [16]." [17]

The Pfizer BNT162B2, Moderna mRNA-1273 and Janssen Ad26.COV2.S products all encode for and produce full-length spike proteins.

A recent presentation by the Canadian Covid Care Alliance, a group of over 500 independent Canadian doctors, scientists and health care practitioners echoed these concerns about myocarditis in youth and athletes. That presentation is attached as Appendix B.

The risk of developing heart inflammation, and associated heart muscle damage, should be fully disclosed as part of informed consent.

Risk of other Short- and Long-Term Side Effects

Established in 1990, the Vaccine Adverse Event Reporting System (VAERS) is a national early warning system to detect possible safety problems in U.S.-licensed vaccines. VAERS is co-managed by the Centers for Disease Control and Prevention (CDC) and the U.S. Food and Drug Administration (FDA).

The following short-term adverse events have been reported via the Vaccine Event Reporting System (VAERS) as related to novel COVID 19 mRNA and recumbent gene therapies as of February 25, 2022 [19]:

- Total Covid Vaccine Data Reports (1,151,448)
- Deaths (24,827)
- Hospitalizations (135,783)
- Urgent Care Visits (121,670)
- Doctor Office Visits (178,014)
- Severe Allergic Reaction (40,382)
- Life Threatening (28,349)
- Heart Attack (12,731)
- Myocarditis/Pericarditis (35,303)
- Bell's Palsy (14,364)
- Anaphylaxis (9,335)
- Thrombocytopenia/Low Platelet (5,812)
- Miscarriages (4,209)
- Shingles (12,701)
- Permanent Disability (45,615)

Adverse events are underreported VAERS as typically only a fraction of total adverse events are entered into VAERS. "VAERS investigators participated on a panel to explore the perspective of clinicians, electronic health record (EHR) vendors, the pharmaceutical industry, and the FDA towards systems that use proactive, automated adverse event reporting. Adverse events from drugs and vaccines are common, but underreported. Although 25% of ambulatory patients experience an adverse drug event, less than 0.3% of all adverse drug events and 1-13% of serious events are reported to the Food and Drug Administration (FDA). Likewise, fewer than 1% of vaccine adverse events are reported. Low reporting rates preclude or slow the identification of "problem" drugs and vaccines that endanger public health. New surveillance methods for drug and vaccine adverse effects are needed." [20]

Given the level of under reporting that is known to occur in VAERS [20] the question is raised: Do the adverse events reported above [19] represent the extent of these issues or are they simply the tip of an iceberg?

Figure 4 illustrates annual deaths reported to VAERS since its inception in 1990.

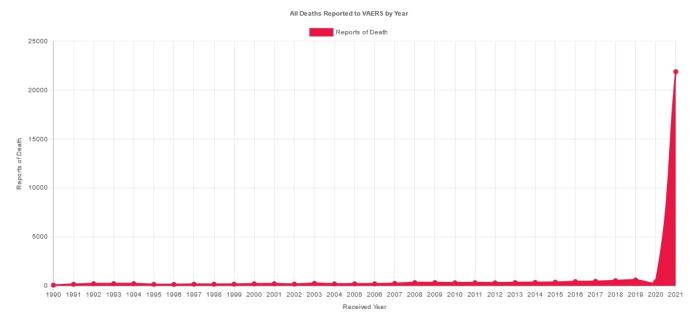


Figure 4: All Deaths Reported to VAERS by Year [19]

Figure 5 illustrates VAERS Covid Vaccine reports of death as a function of days to death onset post vaccination. Note that the majority of deaths occur within the first 3 days post vaccination. This implies a causal relationship.

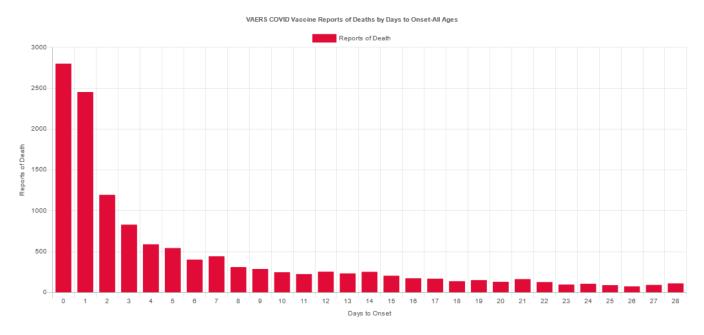


Figure 5: VAERS COVID Vaccine Reports of Deaths by Days to Onset – All Ages [19]

A collection of medical journal articles associated with adverse events observed to date associated with these novel Covid-19 products is included as <u>Appendix A: Sampling of Covid-19 vaccination associated Adverse Events (AEs)</u>. Note that these Adverse Events are short-term. The Long-Term safety profiles of these novel products have not been determined.

The risk of short-term adverse events should be fully disclosed as part of informed consent.

Novel products do not prevent infection or transmission of SARS-CoV-2

A recent report published in the European Journal of Epidemiology evaluating cases per million people across 68 countries shows a slightly increase in new Covid-19 cases associated with countries having a higher percentage of population fully vaccinated [21]. For a sterilizing vaccine (one that prevents infection and transmission) a decreasing trend in cases with increasing vaccination rates would be expected.

"At the country-level, there appears to be no discernable relationship between percentage of population fully vaccinated and new COVID-19 cases in the last 7 days (Fig. 6). In fact, the trend line suggests a marginally positive association such that countries with higher percentage of population fully vaccinated have higher COVID-19 cases per 1 million people. Notably, Israel with over 60% of their population fully vaccinated had the highest COVID-19 cases per 1 million people in the last 7 days." [21]

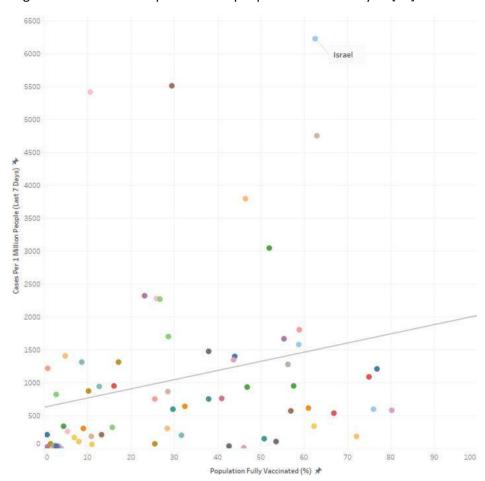


Figure 6: Relationship between cases per 1 million people (last 7 days) and percentage of population fully vaccinated across 68 countries as of September 3, 2021 [21].

The risk of infection and transmission post-vaccination should be fully disclosed as part of informed consent.

Waning product efficacy and "booster" doses

A recent study out of Israel illustrates that immune escape variants readily spread among a highly vaccinated population only 4 to 6 months post vaccination.

"A nosocomial (hospital) outbreak of SARS-CoV-2 Delta variant infected 42 patients, staff and family members; 39 were fully vaccinated. The attack rate was 10.6% (16/151) among exposed staff and reached 23.7% (23/97) among exposed patients in a highly vaccinated population, 16–26 weeks after vaccination (median: 25 weeks). All cases were linked and traced to one patient. Several transmissions occurred between individuals wearing face masks. Fourteen of 23 patients became severely sick or died, raising a question about possible waning immunity" [22]

The mitigation strategy for waning product efficacy thus far has been to focus on additional "booster" doses of the original Pfizer, Moderna and Johnson & Johnson products, products that were developed to induce an immune response to target the initial "Wuhan" strain spike proteins of SARS-CoV-2. As a result of this selective immune pressure the early Wuhan strains have effectively gone extinct (Figure 7, B.1.1.7, B.1.526 and P.1) while the immune escape variants (Delta strains, B.1.617.2 and AY.3) largely bypass the initial protection afforded by these products. Note that this all happened over a period of just 3 months. "Boosting" again with the product formulations for the Wuhan strain appears to be a case of chasing diminishing returns when Delta has already achieved immune escape against this formulation. Unless a vaccine is sterilizing the virus will continue to mutate and spread. This process is repeating with Omicron now rapidly replacing Delta as the dominant strain.

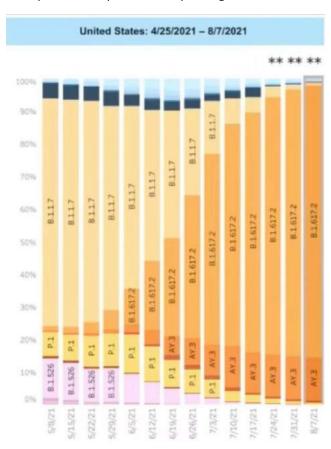


Figure 7: Delta strain immune escape variant becomes dominate in the U.S. (B.1.617.2) (credit P.M., MD)

Non-sterilizing products (which do not prevent infection or transmission) coupled with an increase in disease occurrence driven by immune escape variants place both vaccinated and unvaccinated at increased health and safety risk of contracting Covid-19.

Waning product efficacy post-vaccination should be fully disclosed as part of informed consent.

Novel products do not reduce viral load of SARS-CoV-2

A recent study out of Wisconsin compared RT-PCR cycle threshold (Ct) data from 699 test-positive anterior nasal swab specimens from fully vaccinated (n = 310) and unvaccinated (n=389) individuals. They focused on low cycle thresholds (less than 25 cycles). RT-PCR cycle threshold values less 25 have previously been associated with shedding of infectious SARS-CoV-2.

"We observed low Ct values (<25) in 212 of 310 fully vaccinated (68%) and 246 of 389 (63%) unvaccinated individuals. Low Ct values were detected in vaccinated people regardless of symptoms at the time of testing. Ct values <25 were detected in "158 of 232 unvaccinated (68%, CI: 62-74%) and 156 of 225 fully vaccinated (69%; CI: 63-75%) symptomatic individuals." [23]

The viral loads they observed were effectively the same regardless of vaccination status.

As these studies show no reduction in infection rates, transmission rates or symptomatic viral load between vaccinated and unvaccinated, they illustrate little if any collective benefit associated with these novel products.

Incomplete and compromised long-term Safety and Efficacy trials

Clinical trials are ongoing and not scheduled to complete until 2023 [24], [25], [26].

In several trials the control subjects have been unblinded and offered the novel products. This has effectively tainted the control group and compromised the validity of these trails [24], [25].

"Participants who originally received placebo will be offered the opportunity to receive BNT162b2 (Pfizer-BioNTech) at defined points as part of the study" [24].

"Participants who were previously enrolled in the mRNA-1273-P301 (Moderna) study, and chose to be unblinded. [25]"

This unblinding of the placebo (control) groups is illustrated in Figures 8 and 9 for the Pfizer trial.

WHAT WAS SUPPOSED TO HAPPEN

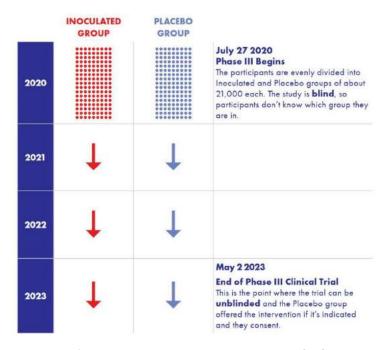


Figure 8: Pfizer clinical trial as originally planned [27]

WHAT ACTUALLY HAPPENED

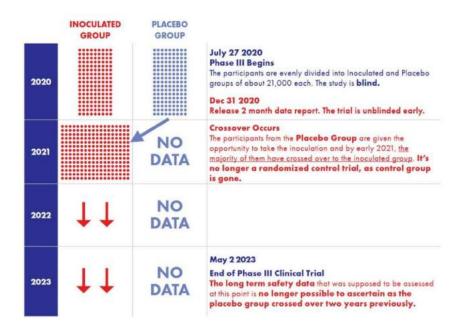


Figure 9: Pfizer clinical trial as executed [27]

The unblinding of the Randomized Clinical Trials (RCTs) should be fully disclosed as part of informed consent.

FDA Approved Comirnaty versus the FDA-authorized Pfizer-BioNTech COVID-19 Vaccine under EUA

By approving BioNTech product Comirnaty, which is currently available in Europe but unavailable in the Washington State [28] the FDA may have inadvertently given the impression that the available Pfizer (BNT162b2) product is FDA approved when in fact it's EUA has simply been extended.

"The FDA-approved COMIRNATY (COVID-19 Vaccine, mRNA) and the FDA-authorized Pfizer-BioNTech COVID-19 Vaccine (BNT162b2) under Emergency Use Authorization (EUA) have the same formulation and can be used interchangeably to provide the COVID-19 vaccination series. The licensed vaccine has the same formulation as the EUA-authorized vaccine and the products can be used interchangeably to provide the vaccination series without presenting any safety or effectiveness concerns. The products are legally distinct with certain differences that do not impact safety or effectiveness. [1] "

From the FDA Letter of Authorization to Pfizer dated January 3, 2022, Section I [28]:

Criterion for Issuance of Authorization, Paragraph C: "There is no adequate, approved, and available alternative¹⁹ Pfizer-BioNTech COVID-19 Vaccine to prevent COVID-19."

Note 19: "Although COMIRNATY (COVID-19 Vaccine, mRNA) is approved to prevent COVID-19 in individuals 16 years of age and older, there is not sufficient approved vaccine available for distribution to this population in its entirety at the time of reissuance of this EUA. Additionally, there are no COVID-19 vaccines that are approved to provide: COVID-19 vaccination in individuals 5 through 15 years of age; a third primary series dose to certain immunocompromised populations described in this EUA; a homologous booster dose to the authorized population described in this EUA; or a heterologous booster dose following completion of primary vaccination with another authorized COVID-19 vaccine."

The legal difference is that "Comirnaty" is FDA approved for interstate commerce and marketing while the Pfizer (BNT162b2) product is still under Emergency Use Authorization (EUA). Under the 2005 Public Readiness and Emergency Preparedness (PREP) Act vaccine manufacturers have full legal and financial immunity from any injury or damages incurred resulting from an EUA product [29]. From a legal perspective this means that all of the other EUAs issued for Moderna, J&J, etc. can remain in force as the EUA nullification conditions of (a) FDA approval and (b) product availability in the US have not been met with the BioNTech Corminaty product. If an FDA Approved and *available* product to treat Covid-19 were to come onto the US market it would legally nullify all other active EUAs [30]. This also means that currently all of the EUA products retain full legal and financial immunity for their manufacturers.

At this time the Moderna product is being approved under the trade name "SpikeVax". It is anticipated that this product will not be made initially available in the US market in a similar fashion to Corminaty, and that the available Moderna product will remain under EUA for the foreseeable future.

Lack of FDA Approved and Licensing for products currently available in Washington State

None of these novel products currently available in the Washington State are FDA approved nor licensed, rather these have been authorized under Emergency Use Authorization (EUA). An EUA is a legal designation that allows

for the distribution of an experimental treatment or other medical agent prior to completion of clinical safety and efficacy trials and thus prior to formal FDA Approval. An EUA is not the same as an FDA approval or FDA Licensing [30].

As long-term clinical safety trials are incomplete and compromised (unblinded), and as the long-term (multiyear) safety profiles have yet to be established, these novel medical products are, by definition, experimental in nature.

The Nuremburg Code and Voluntary Informed Consent

"The judgment by the war crimes tribunal at Nuremberg laid down 10 standards to which physicians must conform when carrying out experiments on human subjects in a code that is now accepted worldwide.

This judgment established a new standard of ethical medical behavior for the post World War II human rights era. Amongst other requirements, this document enunciates the requirement of voluntary informed consent of the human subject. The principle of voluntary informed consent protects the right of the individual to control his own body." [31]

1. "The voluntary consent of the human subject is absolutely essential.

This means that the person involved should have legal capacity to give consent; should be so situated as to be able to exercise free power of choice, without the intervention of any element of force, fraud, deceit, duress, over-reaching, or other ulterior form of constraint or coercion; and should have sufficient knowledge and comprehension of the elements of the subject matter involved, as to enable him to make an understanding and enlightened decision. This latter element requires that, before the acceptance of an affirmative decision by the experimental subject, there should be made known to him the nature, duration, and purpose of the experiment; the method and means by which it is to be conducted; all inconveniences and hazards reasonably to be expected; and the effects upon his health or person, which may possibly come from his participation in the experiment.

The duty and responsibility for ascertaining the quality of the consent rests upon *each individual who initiates, directs or engages* in the experiment. It is a personal duty and responsibility which may not be delegated to another with impunity." [32]

United Nations (UNESCO) Universal Declaration on Bioethics and Human Rights

From the UN Universal Declaration of Human Rights, Article 6, Section 1 [33]. "Any preventive, diagnostic and therapeutic medical intervention is only to be carried out with the prior, free and informed consent of the person concerned, based on adequate information. The consent should, where appropriate, be express and may be withdrawn by the person concerned at any time and for any reason without disadvantage or prejudice."

Summary

In summary the following concerns are raised with respect to these novel mRNA and recumbent DNA gene therapy products:

- 1) These novel Covid-19 products do not prevent Covid-19 infection.
- 2) These novel Covid-19 products do not prevent SARS-CoV-2 transmission.
- 3) What personal (non-collective) benefit these products do provide wanes rapidly over the course of months necessitating booster doses. The boosters are currently still "tuned" to the original formula for the Wuhan strain of SARS-CoV-2, which is now effectively extinct in the wild. Boosting against new variants (Delta, Omicron) that have already immune escaped the initial strain protection stands to be a case study in diminishing returns. Boosting with updated formulation(s) against these immune escape variants will drive new variants (wash, rinse, repeat).
- 4) Significant severe short term adverse effects (including death) have been reported via VAERS [19], medical journals (see Appendix A, attached) and are documented in the Pfizer Post-Authorization Analysis (which includes 9 pages of Adverse Events of Special Interest) [10]. Repeated doses may have a cumulative effect (majority of myocarditis cases in young men occur within 7 days of the 2nd dose of Covid-19 mRNA product administration) [14]. The concern is raised that these novel products place recipients at risk of significant health and financial harm based on the observed short term side effects and a history of failed vaccine development attempts for this family of viruses.
- 5) Long term side effects are unknown, however early evidence is suggestive of Antibody Dependent Enhancement of Disease (ADE), Vaccine Associated Enhanced Disease (VAED), downgrading of the innate immune system in favor of spike protein specific antibody development (original antigenic sin) which viral variants have already found a way around (immune escape) and the potential of long term consequences of vaccine induced endotheliitis (myocarditis and pericarditis).
- 6) The concern is raised that the vaccinated population may be at increasing risk of catching and transmitting SARS-CoV-2 variants due to ADE/VAED [10], [11]. Non-sterilizing products (products which do not prevent infection or transmission) coupled with an increase in disease occurrence driven by immune escape variants place both vaccinated and unvaccinated at increased risk of Covid-19.
- 7) Under EUA law [29] the product manufacturers are immune from legal and financial responsibility for any adverse health effects or associated damages. Legal and financial liability for any short or long-term adverse events associated with the incentivization of these novel products is unclear, and may ultimately fall on those individuals and organizations incentivizing, coercing and/or mandating their usage.
- 8) Given the observed short-term adverse events and the lack of long-term safety data, the mandating of novel Covid-19 gene therapies for students as a condition of public school attendance may ultimately be adjudicated as medical coercion in violation of Informed Consent.
- 9) The concern is raised that Fully Informed Consent is not being provided and attained during the administration of these experimental EUA products, and that legal and lawful action may be brought against those who fail to adequately and fully disclose the risks identified in this document as a necessary part of Fully Informed Consent [30]. The same applies to individuals or organizations that

initiate or direct people to engage in these medical experiments. Where this is medical risk there must be free choice (Nuremburg, UNESCO).

Dated this the STU day of MARCH	20 22.	
	Kenned H. Kp II	
	Signature of Affiant	
SWORN to and subscribed before me, this the _	8 day of March	, 20 <u>22</u>
My commission expires	Notary Public	
My commission expires	April 2 2025	

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Appendix A

Sampling of Covid-19 vaccination associated Adverse Events (AEs) observed to date

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Appendix B

More Harm Than Good

Presentation by the Canadian Covid Care Alliance, December 16, 2021

www.canadiancovidcarealliance.org

THE PFIZER INOCULATIONS FOR COVID-19

MORE HARM THAN GOOD





Our alliance of over 500 independent Canadian doctors, scientists, and health care practitioners is committed to providing quality, balanced, evidence-based information to the Canadian public about COVID-19 so that hospitalizations can be reduced, lives saved, and our country safely restored to normal as quickly as possible.



WE SUPPORT

The doctor/patient relationship and personalized care

Informed consent and treatment options

Free and open scientific discourse

Safe & effective vaccines









The federal, provincial and municipal governments in Canada have a responsibility to protect the health of Canadians as well as our Charter Rights and Freedoms. Any medical interventions approved by Health Canada must first be PROVEN SAFE.

Due diligence in research, as well as adherence to established protocols of the doctor/patient relationship, informed consent and scientific inquiry are essential to carrying out that responsibility.

Deviating from those practices, causing harm and failing to disclose risks of harm is negligent at best.





Hierarchy of evidence

Pfizer's 2 month data report, Dec 31 2020

- ARR vs RRR explained VIDEO
- Early unblinding of Pfizer's randomized control trial

Pfizer's 6 month data report, Sep 15 2021

- Increased risk of illness
- Increased risk of death

The Pfizer Trials - What went wrong

- Pfizer did not follow established protocols
- Misleading demographics Wrong age
- Misleading demographics Tested on healthy, given to sick
- Inadequate control groups
- Did not track biomarkers
- Wrong clinical endpoints
- Not tested for spread reduction
- Subjective testing
- Missing data Lost to follow up and Suspected, but unconfirmed

- Failure to test Why it matters
- 12 15 trial All risk, no benefit
- 12 15 trial Failure to report serious adverse events
- 5 11 year olds Risking their health
- Myocarditis is serious
- The FDA abandons "First, do no harm"
- 5 11 year olds No informed consent
- The BMJ Pfizer trial whistleblower article

A critical eye on the Sep 15 2020 report

- 6 month data manipulation Mixed cohorts
- The Pfizer trials did not prove safety they proved harm

How this is playing out in the real world

- Roll out surveillance You don't find what you don't look for
- Rising incidents of heart issues in young people (Ontario Public Health Report)
- This is not normal High incidences of deaths in athletes (German, Israeli news articles)

- This is supposed to be rare VIDEO of athletes collapsing
- Pfizer's post marketing pharmacovigilance report

Considerable evidence of conflict of interest

- Pfizer is making billions
- The public record of Pfizer's corporate culture
- Links to articles on Pfizer's past behaviour
- Conflicts of interest among Pfizer report authors
- The CDC has redefined "vaccine"
- The media has been captured VIDEO

This is no way to manage a supplier

The inoculations should be withdrawn immediately

Recommended reading & viewing



THE HIERARCHY OF EVIDENCE

- A randomized control trial is LEVEL 1
 Evidence, the highest form of evidence there is. It is considered the Gold Standard and is the only way to prove something is true.
- Models are LEVEL 5 or lower as they are expert opinion/speculation.
- Policy should be determined by the highest level of evidence available, LEVEL 1.

Levels of Scientific Evidence

	Level	Example of Evidence
Higher	Level 1	Meta-analysis of Homogenous RCTs Randomized Control Trial
	Level 2	Meta-analysis of Level 2 or Heterogenous Level 1 Evidence Prospective Comparative Study
	Level 3	Review of Level 3 Evidence Case-control Study Retrospective Cohort Study
	Level 4	Uncontrolled Cohort Studies Case Series
	Level 5	Expert Opinion Case Report Personal Observation
Lower	Foundational Evidence	Animal Research In Vitro Research Ideas, Speculation

PFIZER'S INOCULATIONS FOR COVID-19 / MORE HARM THAN GOOD



PFIZER'S ORIGINAL TRIAL REPORT DECEMBER 31 2020

- Published in New England Journal of Medicine
- Showed 2 months worth of safety & efficacy data
- Described starting with 43,548 people divided into:
 - 1. Treatment group (received inoculation)
 - Control group (received saline)
 for 2 months to see who developed COVID-19
- The claim was that the inoculations were safe and showed 95% efficacy
 7 days after the 2nd dose. But that 95% was actually Relative Risk
 Reduction. Absolute Risk Reduction was only 0.84%.

IN NEW ENGLAND IDURNAL O REDICING

RESEARCH SUMMARY

Safety and Efficacy of the BNT162b2 mRNA Covid-19 Vaccine

F.P. Polack, et al. DOI: 10.1056/NEJMea2034577

CLINICAL PROBLEM

Safe and effective vaccines to provent severe acute respiratory syndrome coronaviras 2 (SARS-2GO-2) infection and Covid-19 are urgently needed. No vaccines that pentier against betacoronavirases are currently available, and mUNA-based vaccines have not been whelly resed.

CLINICAL TRIAL

A randomized, double-blind study of an mRNA vaccine encoding the SARS-CoV-2 spike protein.

43,548 participants 216 years old were assigned to receive the vaccine or placebo by interamuscular injection on tay 0 and day 21. Participants were followed for safety and for the development of sympozmatic Covid-10 for a median of 2 months.

RESULTS

Safety

Vaccine recipients had local reactions (pain, crythems, swelling) and systemic reactions (e.g., feer, headache, mydigias) at higher rates than placebo recipients, with mate reactions following the second dose. Most were mild to moderate and resolved rapidly.

Efficiey:

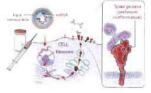
The vaccine showed protection 7 days after the second dose; 95% officacy was observed.

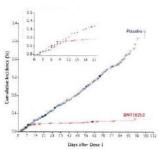
LIMITATIONS AND REMAINING QUESTIONS

Further study is required to understand the following:

- Safety and efficacy beyond 2 months and in groups not included in this trial (e.g., children, pregnant
- Whether the vaccine protects against asymptomatic infection and transmission to unvaccinated persons.
- How to ded with those who miss the second vaccine dose.

Links: Full article | Quick Take | Editorial





Vaccine efficacy of 95% [95% credible interval, 90.3 -97.6%)

CONCLUSION

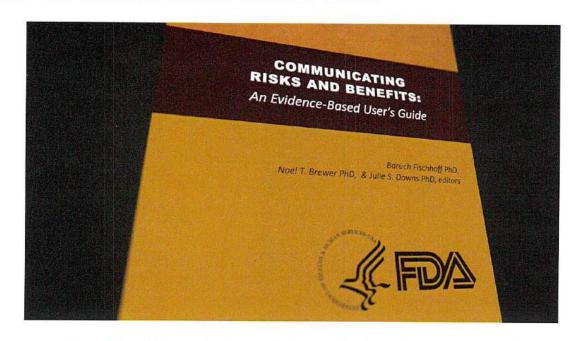
Two doses of an mRNA-based raccine were safe over a medium of two months and provided 95% protection against symptomatic Covid-19 in persons 16 years of age or older.

complete abilitions must their extent

7



ABSOLUTE RISK REDUCTION VS RELATIVE RISK REDUCTION

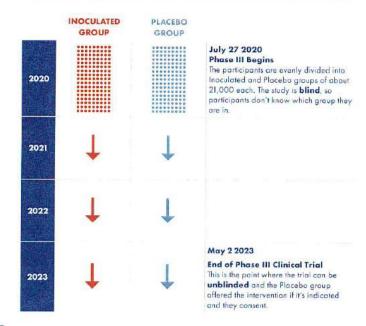


https://rumble.com/vobcg5-relative-vs-absolute-risk-reduction.html

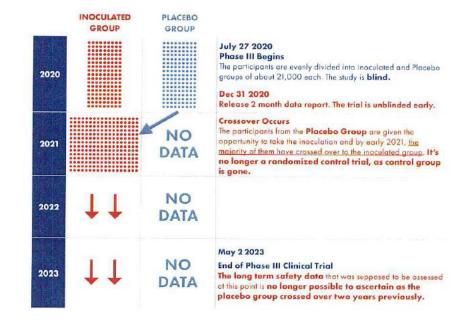


EARLY UNBLINDING OF RANDOMIZED CONTROL TRIAL NO LONG TERM SAFETY DATA

WHAT WAS SUPPOSED TO HAPPEN



WHAT ACTUALLY HAPPENED



PFIZER'S INOCULATIONS FOR COVID-19 / MORE HARM THAN GOOD



PFIZER'S 6 MONTH REPORT DATA LEVEL 1 EVIDENCE OF HARM

- Pfizer's most recent report indicates an Efficacy of 91.3%. (Which means a reduction in positive cases compared to placebo group.)
- But it also showed, compared to the placebo group, an increase in illness and deaths.
- There is no benefit to a reduction in cases if it comes at the cost of increased sickness and death.

The NEW ENGLAND JOURNAL of MEDICINE

ORIGINAL ARTICLE

Safety and Efficacy of the BNT162b2 mRNA Covid-19 Vaccine through 6 Months

S.J. Thomas, E.D. Moreirs, Jr., N. Kitchin, J. Abtalon, A. Gurtman, S. Lockhart, J.L. Perez, G. Pérez Marc, F.P. Polack, C. Zerbini, R. Bailey, K.A. Swanson, X. Xu, S. Roychoudhury, H. Koury, S. Bauguermauh, W.V. Kalina, D. Cooper, R.W. Frenck, Jr., L. L. Hammitt, Ö. Türec, H. Nell, A. Schaefer, S. Onal, O. Yang, P. Liberator, D.B. Tresnan, S. Mather, P.R. Dormitzer, U. Şahin, W.C. Gruber, and K.U. Jansen, for the C4591001 Clinical Trial Groups

BNT10506 is a lipid nanoparticle-formalated, nucleoside-modified RNA vaccine
encoding a prefusion-scalabilited, mentionar-encheoid exvera caute respiratory synresponsabilited, mentionar-encoded exvera caute respiratory synresponsabilited, mentionar-encoded exvera caute respiratory syndrume consumiras 2 (SARS-CoV-2) full-length spike protein, BNT10502 is highly
efficacious against coronavirus disease 2019 (Covid-19) and is currently approved,
efficacious against coronavirus disease 2019 (Covid-19) and is currently approved,
exceptionary to the control of the contro initial authorization, data beyond 2 months after vacionation were unavailable.

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in an ongoing, placeho-controlled, observer-blinded, multinational, pivocal efficacy trial, we randomly assigned 44,365 participants 16 years of age or older and 2264 Trisantidewa published on September 15 participants 12 to 15 years of age to receive two 30-ug doses, at 21 days apart, of 2021, at NF3M.etg. BNT162b2 or placebo. The trial end points were varcine efficacy against laboratory-confirmed Covid-19 and safety, which were both evaluated through 6 months after confirmed Covid-19 and safety, which were both evaluated through 6 months after precipation.

BNT162b2 continued to be safe and have an acceptable adverse-event profile. Few participants had adverse events leading to withdrawal from the trial. Vaccine efficacy against Covid-19 was 91.3% (95% confidence interval (CI), 89.0 to 93.2) through 6 months of follow-up among the participants without evidence of previous SARS-CoV-2 infection who could be evaluated. There was a gradual decline in vaccine efficacy. Vaccine efficacy of 86 to 100% was seen across countries and in populations with diverse ages, seems, race or ethnic groups, and risk factors for Covid-19 among participants without evidence of previous infection with SARS-CoV-2. Vaccine efficacy against severe disease was 96.7% (95% CI, 80.3 to 99.9). In South Africa, where the SARS-CoV-2 variant of concern B.1.351 (or beta) was predominant, a vaccine efficacy of 100% (95% Cf, 53.5 to 100) was observed.

Through 6 months of follow-up and despite a gradual decline in vaccine efficacy, BNT162b2 had a favorable eafety profile and was highly efficacious in preventing Covid-19. (Funded by BioNTech and Pfizer, Clinical Trials, gov number, NCT0456872B.)



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The New Bineland Jownal of Medicine usded from nejmorg on Nevember 10, 2021, Nev personal use only. No other uses without permanter Copyright © 2021 Manuschmetts Medical Society. All rights reserved. PFIZER'S INOCULATIONS FOR COVID-19 / MORE HARM THAN GOOD



Screen capture from Pfizer & Month Supplementary Appendix

Adverse Event	BNT162b2 (N*=21,926) n ^b (%)	Placebo (N=21,921) n ^b (%)
Any event	6617 (30.2)	3048 (13.9)
Related	5241 (23.9)	1311 (6.0)
Severe	262 (1.2)	150 (0.7)
Life-threatening	21 (0.1)	26 (0.1)
Any serious adverse event	127 (0.6)	116 (0.5)
Related ^{e,d}	3 (0.0)	0
Severe	71 (0,3)	66 (0.3)
Life-threatening	21 (0.1)	26 (0.1)
Any adverse event leading to withdrawal	32 (0.1)	36 (0.2)
Related	13 (0.1)	11 (0.1)
Severe	10 (0.0)	10 (0,0)
Life-threatening	3 (0.0)	7 (0.0)
Death	3 (0.0)	5 (0.0)

Table S3 | Participants Reporting at Least 1 Adverse Event from Dose 1 to 1 Month After Dose 2 During the Blinded Follow-up Period. The population included all ≥16-year-old participants who received ≥1 dose of vaccine irrespective of follow-up time. a. N=number of participants in the specified group. This value is the denominator for the percentage calculations. b. n=Number of participants reporting ≥1 occurrence of the specified event category. For 'any event', n=number of participants reporting ≥1 occurrence of any event. c. Assessed by the investigator as related to investigational product. d. Shoulder injury related to vaccine administration, right axillary lymphadenopathy, and paroxysmal ventricular arrhythmia (as previously reported). Adverse events for 12–15-year-old participants were reported previously.

Solety and Efficacy of the BNT162h2 mRNA Coxid-19 Vaccine through 6 Months. Supplementary Appendix

A **significant increase in illness**, which the Pfizer inoculations were supposed to reduce.

	BNT162b2	Placebo	Risk Change
Efficacy (Meaning number of people diagnosed with COVID-19.)	77	850	-91%
Related Adverse Event (Meaning an investigator has assessed it as related to the BNT162b2 injection.)	5,241	1,311	+300%
Any Severe Adverse Event [Interferes significantly with normal function.]	262	150	+75%
Any Serious Adverse Event (Involves visit to ER or hospitalization.)	127	116	+10%



INCREASED RISK OF

Screen capture from Hizer & Month Supplementary Appendix

Reported Cause of Death*	BNT162b2 (N=21,926)	Placebo (N=21,921)
Deaths	15	14
Acute respiratory failure	0	1
Aortic rupmre	0	1
Arteriosclerosis.	2	0
Billiary cancer metastatic	0	1
COVID-19	0	2
COVID-19 pneumonia		0
Cardiac arrest	OFFICE OF STATE OF ST	S-03-100 (CO 12)
Cardiac fasture congestive	T	0
Cardiorespiratory arrest		1
Chronic obstructive pulmonary disease	1	0
Death	0	1
Dementia	0	1
Emphysematous cholecystitis	1	0
Hemorrhagic stroke	0	1
Hypertensive heart disease		0
Lung cancer metastatic	1	0
Metastases to liver	0	1
Missing	0	1
Multiple organ dysfunction syndrome	0	2
Myocardial infarction	0	2
Overdose	0	1
Pneumonia	0	2
Sepsis	1	0
Septic shock	1	o
Shigeila sepsis	1	O
Unevaluable event	1	0

	BNT162b2	Placebo
Deaths before unblinding (In Table S4 of Supplementary Appendix)	15	14
Deaths after unblinding [Not in table, but mentioned in text of 6 month report. See quote below.)	5	
Total Deaths	20	14

[&]quot;After unblinding" means when the Placebo participants were given the opportunity to "cross over" and take the BNT162b2 inoculation.*

"...3 participants in the BNT162b2 group and 2 in the original placebo group who received BNT162b2 after unblinding died."

Safety and Efficacy of the BNT162b2 mRNA Covid-19 Vaccine through 6 Months

Concerning Causes of Death

	BNT162b2	Placebo
Total COVID-19 Related Deaths		2
Deaths Related to Cardiovascular Events	9	5

^{*}A total of 19,525 subjects originally randomized to placebe, <u>received at least and dose of BNT IQ252 after imbleding (Dose 3 and Dose 4) and before the March 13,7001, data used</u>



THE PFIZER TRIALS WHAT WENT WRONG





PFIZER DID NOT FOLLOW **ESTABLISHED PROTOCOLS**

Regarding the persistent claim that the COVID-19 inoculation products do not need to be tested, because mRNA technology has already undergone testing: mRNA technology is the delivery mechanism, not the inoculation. That's like saying that since we've used syringes safely before, anything injected via syringe is safe. (And in fact, there are still a lot of unknowns about the effects of the mRNA delivery mechanism.)

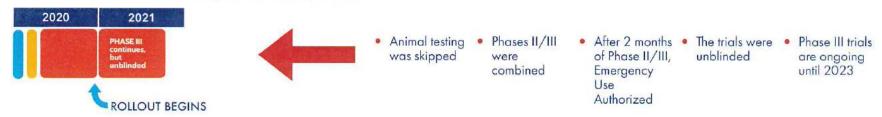
NORMALLY, VACCINE DEVELOPMENT LOOKS LIKE THIS, WITH A TIMELINE OF 5 TO 10 YEARS.



RARELY, IT CAN BE DONE IN AS LITTLE AS 5 YEARS.



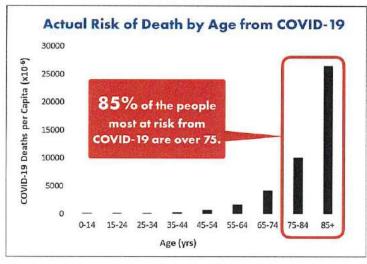
FOR THE COVID-19 INOCULATIONS, IT WAS DONE IN 1 YEAR.





MISLEADING DEMOGRAPHICS WRONG AGE FOR TARGET POPULATION

When designing a trial for the efficacy and safety of a potential treatment, the focus should be on the target population who could most benefit from that treatment. Instead Pfizer chose participants from younger demographic that would be a) less likely to need a vaccine, b) less likely to suffer an adverse event during a trial, c) more likely to respond well to a vaccine, as the elderly have comparatively poor immune responses.



COVID-19 Deaths per capita by age in the United States (as of Jun 5, 2021). Population-based on U.S. CDC WONDER Bridge-Race Population Estimate 2019. Data obtained from https://wonder.cdc.gov/bridged-race-w2019.html

	Pfizer Trial Demographics	S	
	pulation for the primary efficacy endpoi eccived vaccine and placebo, stratified by	THE STATE OF THE PARTY OF THE P	of
AGE GROUP	Pfizer-BioNTech COVID-19 Vaccine (N = $18,242)$ n (%)	Placebo (N = 18,379) n (%)	
≥12 through 15 years ^b	46 (0.3 %)	42 (0.2 %)	_
≥16 through 17 years	66 (0.4 %)	68 (0.4 %)	Yet 75+ year olds
≥16 through 64 years	14,216 (77.9 %)	14,299 (77.8 %)	represent only 4% o
≥65 through 74	3176 (17.4 %)	3226 (17.6 %)	trial subjects.
>75 years	804 (4.4 %)	812 (4.4 %)	公司 医动态 化合作图 计算是对单位程序的现

FACT SHEET FOR HEALTHCARE PROVIDERS ADMINISTERING VACCINE (VACCINATION PROVIDERS)
EMERGENCY USE AUTHORIZATION (BUA) OF THE PREZEBBIONTECH COVID-19 VACCINE TO PREVENT
CORPONAVIRUS DISEASE 2019 (COVID-19)
https://dob.ling.nipre.com/Show.labelno.appr@del14871.

MISL TEST

MISLEADING DEMOGRAPHICS TESTED ON HEALTHY, GIVEN TO SICK



Pfizer Trial Protocols - Exclusions

REAL WORLD
CO-MORBIDITIES

PFIZER TRIAL CO-CONDITIONS

95% of people
who have died with
COVID-19 have had at
least 1 co-morbidity
listed as cause of death.
The average is 4 comorbidities.

http://www.ndc.gov/nchr/nosc/syn/cased workly/mdes.html http://wwk4_ world:kK5-WOHFGARW/WD3DFdLOKaDEPGpWmPW(pbEspW/2D, Only 21% had a co-existing condition.

IMPLICATIONS FOR ROLL OUT

- We are told the inoculations are "safe." Yet many health conditions in fact a list several pages long were excluded from the trials, including pregnant or breastfeeding women, people with allergies, with psychiatric conditions, immunocompromised people, people with bleeding disorders, people who had previously tested positive for COVID-19, people who had been prescribed steroids, etc., so there has never been any data to make safety claims about those people. Yet they are also not excluded from mandates and vaccine passports.
- The vaccines were tested on the healthy, and then immediately given to the frailest members of the society - the elderly with multiple health conditions. This is unscientific and unethical.



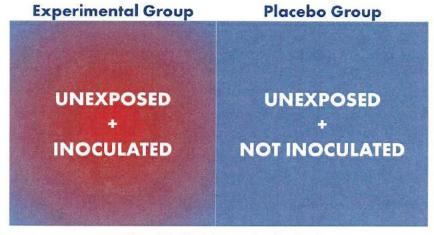
Pfizer only observed 2 groups:

- UNEXPOSED & INOCULATED
- UNEXPOSED & NOT INOCULATED

PFIZER'S INOCULATIONS FOR COVID-19 / MORE HARM THAN GOOD

They should have included two more groups:

- EXPOSED & INOCULATED, people who had recovered, then got the inoculation, to see if the inoculation was safe for them
- EXPOSED & NOT INOCULATED people who were recovered and not inoculated to see how the inoculations stacked up against natural immunity



Should also have included





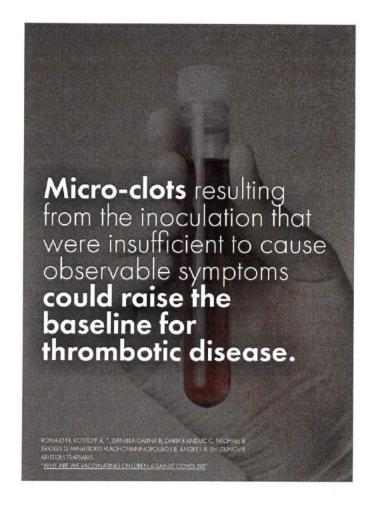
LOW QUALITY SAFETY SCIENCE DIDN'T TRACK BIOMARKERS

As Kostoff et al. highlighted in a recent paper, "Why are we vaccinating children against COVID-19?" (highly recommended), that while the Pfizer trials tested for antibodies and tracked adverse events in terms of symptoms, they didn't test for adverse events at the subclinical (pre-symptom) level.

This was extremely unsafe, because symptoms/diseases are typically end points of processes that can take months, years, or decades to surface. By the time you get to symptoms, things can have gone pretty wrong. (Think diabetes or high blood pressure, where the disease can be quite advanced before any symptoms occur.) Pfizer should have been tracking biomarkers that would have been early warning indicators for disease caused by the inoculations.

High quality safety science would have meant they should have tested before & after inoculation for:

- d-dimers for evidence of enhanced coagulation/clotting (several of our doctors have noticed increased levels of d-dimers in inoculated patients presenting with stroke like symptoms - video available here)
- C-reactive protein for evidence of enhanced inflammation
- troponins for evidence of cardiac damage
- occludin and claudin for evidence of enhanced barrier permeability
- blood oxygen levels for evidence of enhanced hypoxia
- amyloid-beta and phosphorylated tau for evidence of increased predisposition to Alzheimer's disease
- Serum HMGB1, CXCL13, Dickkopf-1 for evidence of an increased disposition to autoimmune disease, etc.





WRONG CLINICAL ENDPOINTS SHOULD HAVE FOCUSED ON ALL CAUSE MORTALITY & ILLNESS

The fear with COVID-19, was that it was going to a) kill people, b) make them sick.

So any COVID-19 vaccine clinical trial should set out to ask the question "Do people who take the vaccines have less illness and death than those who don't?"

Illness + Death should be the CLINICAL ENDPOINTS. And not just illness + death with COVID-19, but any and all illness and death, in order to make sure that the vaccines are not causing harm.

This is well known. It was learned decades ago with cancer drug trials. At first, they used a clinical endpoint of "Did the drug shrink the cancer?" If it did, they called it effective. But it turned out the drugs were not only killing cancer, they were killing patients. They were forced to change the design of their trials and switch to "all cause mortality" as the primary endpoint instead and show that people receiving the drug actually live longer than those who don't. (J.Bart Classen has written an excellent research article on the subject. Read here.)

(After the proper early safety phases of development were completed.) "Do people who take the vaccines have less illness and death than those who don't?" YES. Proceed to long terms safety studies. NO. Go back to the drawing board. WHAT ACTUALLY HAPPENED (Without the proper early safety phases of development having been completed.) "Do people who take the vaccines test positive for COVID-19 less often?" YES. Proceed to world NO. The trial set up

made this result unlikely).

NOT TESTED FOR SPREAD REDUCTION VACCINE PASSPORTS UNJUSTIFIED

Although vaccine passports are now being used to ostensibly prevent or reduce transmission of COVID-19, this outcome was never studied in the trial and it is inappropriate to assign that capability to these inoculations. There is no evidence at all that they reduce the spread of disease and transmission was never one of the study's endpoints.

LIMITATIONS AND REMAINING QUESTIONS

Further study is required to understand the following:

- Safety and efficacy beyond 2 months and in groups not included in this trial (e.g., children, pregnant women, and immunocompromised persons).
 - Whether the vaccine protects against asymptomatic infection and transmission to unvaccinated persons.
 - How to deal with those who miss the second vaccine dose.

Verify Ontario:

Ontario's official app for verifying COVID-19 vaccine certificates.



When a business or organization scans a visitor's digital or paper OR code, this app will:

- · protect user privacy by only reading certificates that are trusted and secure
- · check if a certificate is valid and the visitor can enter
- · show a visitor's name and date of birth so their identity can be verified
- · work offline (without an internet connection)





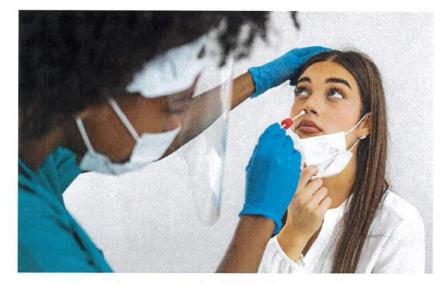


TESTING FAILURES SUBJECTIVE TESTING

The Pfizer trials DID NOT test all participants for COVID-19. Instead, they instructed their investigators to test only those with a COVID-19 symptom and left it up to their discretion to decide what those were.

This means that:

- Asymptomatic infection would be missed entirely
- A high level of subjectivity was introduced to the study - an investigator had the ability to sway the results
- The lack of objective systematic testing makes results unreliable



All participants should have been tested.



MISSING DATA + LOST TO FOLLOW UP

- * SUSPECTED, BUT UNCONFIRMED

	INOCULATED GROUP	PLACEBO GROUP
ENDPOINT DATA - Confirmed COVID Cases	8	162
Participants Lost to Follow Up	80	86
Suspected, but Unconfirmed Cases	1,594	1,816

The basis for the Emergency Use Authorization was the Confirmed COVID cases of 8 vs 162, which meant a Relative Risk Reduction of 95%. But when dealing with such a small number of cases, any change can impact the results significantly.

Lost to follow up means they lost touch with those subjects and can't confirm whether they got sick or not. They don't know.

Suspected, but unconfirmed means these people were symptomatic for COVID-19, but were never tested. (Discretion for testing was left up to the investigator.)

The fact that the Lost to Follow Up and Suspected but Unconfirmed numbers are higher - and here they are even significantly higher - than the End Point numbers means that this data is unreliable. The study should not have been accepted in this state. In normal scientific practice they should have returned to investigate further.

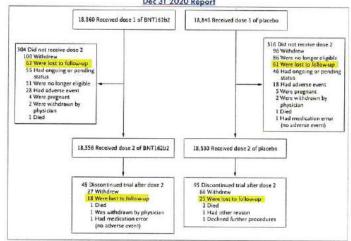
Confirmed Cases

Dec 31 2020 Report

	and the same of the same of the same of		t Evidence of Infe		
Efficacy End-Point Subgroup		BNT162b2 (N=18,198)		Placebo (N=18,325)	
	No. of Cases	Surveillance Time (No. at Risk)*	No. of Cases	Surveillance Time (No. at Risk)*	
Overall	8	2.214 (17,411)	162	2.222 (17.511)	95.0 (90.0-97.9)

Lost to Follow Up

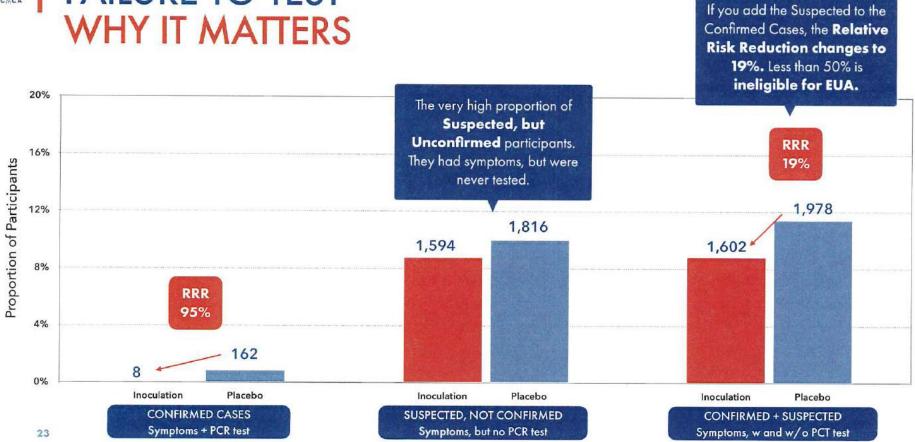
Dec 31 2020 Report



Suspected but Unconfirmed

Vaccines and Related Biological Products Advisory Committee Meeting December 10, 2020 FDA Briefing Document Pfizer-BioNTech COVID-19 Vaccine

Among 3410 total cases of suspected but unconfirmed COVID-19 in the overall study population, 1594 occurred in the vaccine group vs. 1816 in the placebo group. Suspected COVID-19 cases that occurred within 7 days after any vaccination were 409 in the vaccine group vs. 287 in the placebo group. It is possible that the imbalance in suspected COVID-19 cases occurring in the 7 days postvaccination represents vaccine reactogenicity with symptoms that overlap with those of COVID-19. Overall though, these data do not raise a concern that protocol-specified reporting of suspected, but unconfirmed COVID-19 cases could have masked clinically significant adverse events that would not have otherwise been detected.





12-15 ADOLESCENT TRIAL ALL RISK, NO BENEFIT

- This study was severely underpowered, as a study this small will not show up risk.
 - Inoculated group 1,005 (0 tested positive for COVID-19)
- Placebo group 978 (18 tested positive for COVID-19)
- Pfizer claimed these were great results, but since adolescents are at statistically 0% risk of death from COVID-19, and very low risk of severe illness, the inoculation is of little benefit to them. Instead, it presents a very real risk of adverse events.
- But the adolescent Pfizer study wasn't actually designed to find those. A serious adverse event, including death, that occurred at a 1/800 rate might not even show up in a sample of 1,005 people.
- But in this case, it did. Among the 1,005 adolescents, there WAS at least one serious adverse event - Maddie de Garay.



"For children without a serious medical condition, the danger of severe Covid is so low as to be difficult to quantify." -COVID AND AGE, Oct 12, 2021, New York Times



12 -15 ADOLESCENT TRIAL FAILURE TO REPORT SERIOUS ADVERSE EVENTS

Maddie de Garay is a 12 year old trial participant who developed a <u>serious reaction</u> after her second dose and was hospitalized within 24 hours.

Maddie developed gastroparesis, nausea and vomiting, erratic blood pressure, memory loss, brain fog, headaches, dizziness, fainting, seizures, verbal and motor tics, menstrual cycle issues, lost feeling from the waist down, lost bowel and bladder control and had an nasogastric tube placed because she lost her ability to eat. She has been hospitalized many times, and for the past 10 months she has been wheelchair bound and fed via tube.

In their report to the FDA, Pfizer described her injuries as "functional abdominal pain."

 One participant experienced an SAE reported as generalized neuralgia, and also reported 3 concurrent non-serious AEs (abdominal pain, abscess, gastritis) and 1 concurrent SAE (constipation) within the same week. The participant was eventually diagnosed with functional abdominal pain. The event was reported as ongoing at the time of the cutoff date.





Emergency Use Authorization Amendment



5 - 11 YEAR OLDS RISKING THEIR HEALTH

Re: the 5 to 11 year old cohort

In this table, Pfizer, using predictive modelling acknowledges that their inoculations WILL cause myocarditis, but optimistically claims there will be zero deaths from myocarditis in any of their modelled (speculation, level 5 evidence) scenarios.

But **even if it were true**, there is no justification for causing harm to children this way. **FIRST**, **DO NO HARM**.

There is now such a high expectation of heart problems from the inoculations among children that Sick Kids is putting out brochures on how to deal with them.



FDA BRIEFING DOCUMENT EUA AMENDMENT REQUEST FOR PFIZER-BIONTECH COVID-19 VACCINE FOR USE IN CHILDREN 5 THROUGH 11 YEARS OF AGE

Table 14. Model-Predicted Benefit-Risk Outcomes of Scenarios 1-6 per One Million Fully Vaccinated Children 5-11 Years Old

Benefits				Risks				
Sex	Prevented COVID-19 Cases	Prevented COVID-19 Hospitalizat Ions	Prevented COVID-19 ICU Admissions	Prevented COVID-19 Deaths	Excess Myocarditis Cases	Excess Myocarditis Hospitalizat	Excess Myocarditis	Excess Myocarditis Deaths
Males & Females								
Scenario 1	45,773	192	62	1	106	58	34	1
Scenario 2	54.345	250	80	1	106	58	34	
Scenario 3	2,639	21	7	0	106	58	34	1
Scenario 4	58,851	241	77	1	108	58	34	
Scenario 5	45,773	192	62	3	106	58	34	
Scenario 6	45,773	192	62	1	53	29	17	
Males only								
Scenario 1	44,790	203	67	1	179	98	57	
Scenario 2	54,345	250	82	1	179	98	57	
Scenario 3	2,639	21	7	0	179	98	57	
Scenario 4	57,857	254	83	1	179	98	57	
Scenario 5	44,790	203	67	3	179	98	57	0
Scenario 6	44,790	203	67	1	89	49	29	0
Females only					ALCO DE LA			
Scenario 1	45,063	172	54	1	32	18	10	
Scenario 2	54,345	250	78	2	32	18	10	
Scenario 3	2,639	21	7	0	32	18	10	0
Scenario 4	57,938	215	67	2	32	18	10	0
Scenario 5	45,063	172	54	4	32	18	10	0
Scenario 6	45,063	172	54	1	16	9	5	1 0

cenario 1; COVID-19 incidence as of September 11, 2021, VE 70% vs. COVID-19 cases and 80% vs. COVID-19 hospitalization, cenario 2; COVID-19 incidence at peak of U.S. Delta variant surge at end of August 2021, VE 70% vs. COVID-19 cases and 80% COVID-19 hospitalization.

enario 3: COVID-19 incidence as of nad phario 4: COVID-19 incidence as of Set nario 5: COVID-19 case incidence as pitalization, COVID-19 death rate 300° pario 6: COVID-19 incidence as of Set 5s myocarditis cases 50% of Scenario

Low Level (Level 5 Evidence)
SPECULATION - A Predictive Model

MYOCARDITIS

IS SERIOUS

PFIZER'S INOCULATIONS FOR COVID-19 / MORE HARM THAN GOOD

MYOCARDITIS

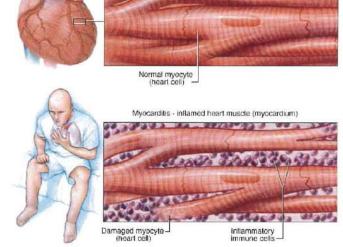
"Myocarditis is an inflammatory process of the myocardium.

(Heart muscle.) Severe myocarditis weakens your heart so that the rest of your body doesn't get enough blood. Clots can form in your heart, leading to a stroke or heart attack."

THE US NATIONAL CENTRE FOR BIOTECHNOLOGY INFORMATION

"The mortality rate is up to 20% at 6.5 years."

https://icmr-online.biomedcentral.com/articles/10.1186/1532-429X-13-51-MZ



Normal heart muscle (myocardium)

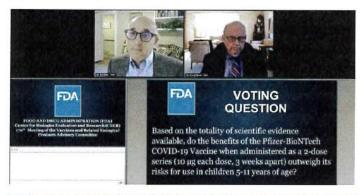
GRANC POLINICATION FOR MEDICAL EDUCATION AND RESEARCH, ALL RIGHTS RESERVED.



Medical interventions are supposed to be **PROVEN SAFE BEFORE** the are rolled out in the population.

Yet **Dr. Eric Rubin**, one of the 18 members of the **FDA advisory panel** who voted, to approve the inoculations for children 5 - 11, actually said the opposite, and suggested that **a population level roll out was an appropriate way to test for adverse events.**

It's worth noting that Dr. Eric Rubin is the editor-in-chief of the New England Journal of Medicine, which publishes the Pfizer trial reports.



"We're never going to learn about how safe this vaccine is unless we start giving it. That's just the way it goes. That's how we found out about rare complications of other vaccines like the rotavirus vaccine. And I do think we should vote to approve it."

Dr. Eric Rubin, FDA advisory panel member.

Harvard prafessor & editor-in-chief of the New England Journal of Medicine.

Yaccines and Related Biological Products Advisory Committee – 10/20/2021.



- Direct-to-consumer advertising of prescription drugs is illegal in Canada, yet politicians from all levels of government are marketing inoculations to children, using cartoons and mascots.
- They are proclaiming the inoculations to be safe, yet the data is not there to back that up. In addition to admitting that their inoculations can cause myocarditis, Pfizer also admits, right in their report, that their long term immune response, efficacy & safety data is limited and that their studies weren't powered to find "rare" side effects as only 1,517 kids got the inoculation.
- How many parents would take their kids to get this shot if they were informed of this? The law of informed consent says they should be, but it's not happening.



of a Covid-19 vaccine in this population; trials of other vaccines are under way. Limitations of the study include the lack of longer-term follow-up to assess the duration of immune responses, efficacy, and safety. However, longer-term follow-up from this study, which will continue for 2 years, should provide clarification. This study was also not powered to detect potential rare side effects of BNT162b2 in 5-to-11-year-olds. However, the safety of BNT162b2 observed in the study com-



THE BRITISH MEDICAL JOURNAL PUBLISHES WHISTLEBLOWER STORY



On November 2nd, the British Medical Journal released an article about their investigation into Ventavia, one of the research companies Pfizer hired to conduct the trials.

It's quite damning. The whistleblower is a Regional Director who actually reported her company to the FDA for:

- Falsifying data
- Unblinding participants
- Not following up and testing participants who reported symptoms
- Mislabelling specimens

Several other employees backed up her account. Despite all this, neither Pfizer, nor the FDA ever audited or investigated the research company, Pfizer never disclosed the problems in its EUA application, and in fact, Pfizer has now hired that same Researcher, Ventavia, to run four more COVID-19 clinical trials.



Covid-19: Researcher blows the whistle on data integrity issues in

Revelations of poor practices at a contract research company helping to carry out Pfizer's pivotal Pfizer's vaccine trial covid-19 vaccine trial raise questions about data integrity and regulatory oversight. Paul D Thacker reports

Paul D Thacker Investigative journalist

In autumn 2020 Pfizer's chairman and chief executive, Albert Bourla, released an open letter to the billions of people around the world who were investing their hopes in a safe and effective covid-19 vaccine to end the pandemic. "As I've said before, we are operating at the speed of science," Bourla wrote, explaining to the public when they could expect a Pfizer vaccine to be authorised in the United States.

But, for researchers who were testing Pfizer's vaccine at several sites in Texas during that autumn, speed may have come at the cost of data integrity and patient safety. A regional director who was employed at the research organisation Ventavia Research Group has told The BMJ that the company falsified data, unblinded patients, employed inadequately trained vaccinators, and was slow to follow up on adverse events reported in Pfizer's pivotal phase III trial. Staff who conducted quality control checks were overwhelmed by the volume of problems they were finding. After repeatedly notifying Ventavia of these problems, the regional director, Brook Jackson, emailed a complaint to the US Food and Drug Administration (FDA). Ventavia fired her later the same day. Jackson has provided The BMJ with dozens of internal company documents, photos, audio

executives later questioned Jackson for taking the

Early and inadvertent unblinding may have occurred on a far wider scale. According to the trial's design, unblinded staff were responsible for preparing and administering the study drug (Pfizer's vaccine or a placebo). This was to be done to preserve the blinding of trial participants and all other site staff, including the principal investigator. However, at Ventavia, Jackson told The BMJ that drug assignment confirmation printouts were being left in participa charts, accessible to blinded personnel. As a corrective action taken in September, two months into trial recruitment and with around 2000 participants already enrolled, quality assurance checklists were updated with instructions for staff to remove drug assignments from charts.

In a recording of a meeting in late September 2020 between Jackson and two directors a Ventavia executive can be heard explaining that the compan wasn't able to quantify the types and number of errors they were finding when examining the trial paperwork for quality control. "In my mind, it's something new every day," a Ventavia executive says. "We know that it's significant."

Ventavia was not keeping up with data entry queries. 1 ---- by ICON, the contract research



A CRITICAL EYE BACK ON THE SEP 15 2021 REPORT

THE NEW ENGLAND JOURNAL OF MEDICINE

ORIGINAL ARTICLE

Safety and Efficacy of the BNT162b2 mRNA Covid-19 Vaccine through 6 Months

5.J. Thomas, E.D. Moreira, Jr., N. Kitchin, J. Absalon, A. Guntman, S. Lockinst, J. L. Perez, C. Piere Manc, F.P. Polisck, C. Evenbort, P. Balley, K.A. Swanson, X. Xu, S. R. Sythouchury, K. Koury, S. Boccownouth, W.V. Galna, D. Cooper, P. Libraton, C.D. H. Thomash, G. Tiller, J. P. Neull, A. Schneiter, D. G. Tong, P. Libraton, C. B. Thomash, S. Mather, P. R. Dormster, U. Sahn, W.C. Grober, and K.U. Jansen, For the C4571001 Clinical Trial Groups.

ABSTRACT

ACCORDANCE

INTIGENS is a lipid manaparticle-formulated, nackeonide-modified RNA vaccine

INTIGENS is a lipid manaparticle-formulated, nackeonide-modified RNA vaccine

The subsection of the su

In an organize placebo-controlled, observer-blinded, multinational, plotted effice, in a organize placebo-controlled, observer-blinded, multinational, plotted effice, placebo-controlled, assigned 44,165 participants is years of age or order and 2564 participants. It is a second to the second participant is proposed to the participants of a placebo. The rail and points were vincine efficied, a plants blooming of a placebo-controlled and safety, which were both evaluated through 6 mouths after the 23th annual plants blooming the 23th annual plants after the 23th

SINTERNA continued to be sufe and have an acceptable adverse-event profile few aparticipants had adverse events lending to withdrawal from the trial. Vaccine of floary against Good years 91.35, 50% confidence from the trial. Vaccine of through 6 macroix 19 years 91.35, 50% confidence from the trial. Vaccine of our SARS-COM information of follow-up same participants without reidence of previous floary National Color who could be evaluated, than without reidence of previous floary. Vaccine office of the contract of the same across countries and in Color. In success of the same across countries and in Color. Vaccine office ages, seem across recommendation of the same for Color. Vaccine office ages, seem and color of the same for some factors with the same seems of the same factors with the same seems of the same factors with the same seems of the sa

Conclusions

Through 6 months of following and despite a gradual decline in vaccine efficacy,

BATIGODA dat 4 forestable safety profile and was highly efficacious in Preventing

Conid-19 (Funded by Bosy) rich and Plizar, Clintal Tradegor musber, NOTO-45687283)

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RUNNING FOOTER ELEMENT



6 MONTH DATA MANIPULATION MIXED COHORTS

Pfizer took the results from their adult trial, which started July 27, 2020, and then added the results from the 12 - 15 year olds' trial, despite the fact that the adolescent trial started four months later.

Since it's well known that the efficacy of the inoculations wanes over time, **this gives a false boost to the efficacy numbers.** The efficacy for these two cohorts should have been reported separately, not presented as one combined result. Without this boost, their efficacy number would likely have fallen.

Jul 27
Adult Trial
(16+)
Begins



Dec Adolescent Trial (12 - 15) Begins



Mar 13

Data Cutoff Date for Efficacy Reported in 6 Month Study

	2020				2021			
JULY	AUG	SEP	ост	NOV	DEC	JAN	FEB	MAR



PFIZER TRIALS DID NOT PROVE SAFETY THEY PROVED HARM

ILLNESS

	BNT162b2	Placebo	Risk Change
Efficacy (Meaning number of people diagnosed with COVID-19.)	77	850	-91%
Related Adverse Event [Meaning an investigator has assessed it as related to the BNT162b2 injection.]	5,241	1,311	+300%
Any Severe Adverse Event (Interferes significantly with normal function.)	262	150	+75%
Any Serious Adverse Event [Involves visit to ER or hospitalization.]	127	116	+10%

DEATHS

BNT162b2	Placebo
20	14

These are the results of Pfizer's own randomized control trial.

LEVEL 1 EVIDENCE OF HARM.



HOW THIS IS PLAYING OUT IN THE REAL WORLD



ROLL OUT SURVEILLANCE YOU DON'T FIND WHAT YOU DON'T LOOK FOR

There is a dramatic difference between passive vs active monitoring of adverse events

- When participants were **actively** followed for adverse events (AEs) in the trials, high percentages of adverse events were reported.
- Once the vaccine was rolled out at the population level, **passive** surveillance was used with Health Canada, VAERS or the European Yellow Card system.

When that happened, the **signal was** completely lost.

TRIAL PARTICIPANTS POPULATION ROLL OUT 100 100 Severe AE Rate AE Rate Severe AE Rate AE Rate 75 75 PERCENTAGE OF TOTAL POPULATION THE SIGNAL IS LOST 50 25 25 0.29 0.07 0 NCT04368728 v-safe NCT04368728 VAERS Health Canada UK Yollow Card BNT 162b2 Thomas Gee MMWR 2021 BNT162b2 Thomas CDC Wonder **Public Access Public Access**

PASSIVE SURVEILLANCE OF

Public Access

ACTIVE SURVEILLANCE OF

NEJM 2021

Solicited

Solicited

NEJM 2021

Unsolicited



RISING INCIDENTS OF HEART ISSUES IN YOUNG PEOPLE

Ontario Public Health is well aware of this, as they published a report on it, but they seem inconsistent in their concerns.

- On Sep 29, 2021, Ontario Public Health recommended young men 18-24 not take the Moderna shot, because of a 1 in 5,000 risk of myocarditis. They suggested Pfizer shot instead, which has a 1 in 28,000 risk of myocarditis.
- But as recently as May 8, 2021, Ontario had stopped the Astra Zeneca shot because of a 1 in 60,000 risk of clotting side effects. which was considered too high.
- Their priorities are inconsistent.

Santé publique Ontario Public Health Ontario



ENHANCED EPIDEMIOLOGICAL SUMMARY

Myocarditis and Pericarditis Following Vaccination with COVID-19 mRNA Vaccines in Ontario: December 13, 2020 to September 4, 2021

This report summarizes reports of myocarditis/pericarditis that have been reported as adverse events zes reports or myocarous/pericarous that have been reported as doverse events of the second of the s

TORONTO SUN

More than 100 Ontario youth sent to hospital for vaccinerelated heart problems: Report

There were 54 persons aged 25-39 included in the tally and 44 persons aged 40 and over

Anthony Furey

Sep 03, 2021 · September 3, 2021 · 2 minute read · 314 Comments



loderna coronavirus disease (COVID-19) vaccine labels are seen arch 19, 2021, PHOTO BY DADO RUVIC / REUTERS



Grieving Father Ernest Ramirez Shares Heartbreaking Story of His Teen Son's Death 5 Days After Pfizer Vaccine





'cardiological evaluation'

Striker admitted to hospital after draw with Alavés 33-year-old to undergo 'diagnostic and therapeutic process'





Isaiah Harris Aged 18 - Pfizer May 2021

Severe Adverse Reaction: Myocarditis (Inflammation of the Heart)
Resulting in a Heart Attack

PFIZER'S INOCULATIONS FOR COVID-19 / MORE HARM THAN GOOD

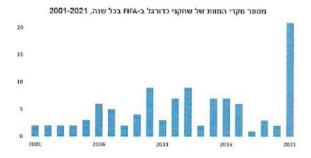
THIS IS NOT NORMAL

A German news site put together a list of over 75 known cases of athletes collapsing - and even dying - in the last 5 months.

https://report24.news/ab-13-iahren-lange-liste-ploetzlich-verstorhener-oderschwerkranker-sapitler/

An Israeli news site analyzed the number of sudden deaths "on the pitch" of members of the International Football Association (FIFA) over the past 20 years.

The average number of FIFA sudden deaths between 2000 - 2020 was 4.2. In 2021, it was 21.



https://www.rtnews.co.il/?view=article&id=49&catid=22

CCRCA

THIS IS SUPPOSED TO BE RARE



https://rumble.com/vpnxkr-are-these-side-effects-extremely-rare.html



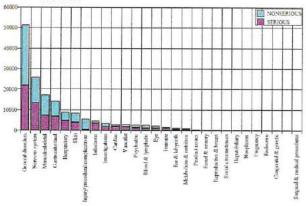
PFIZER'S POST MARKETING PHARMACOVIGILANCE REPORT

- On Nov 17, 2021, the FDA released the first batch of what will ultimately be 329,000 pages they were ordered by a court to provide to satisfy a Freedom of Information request by a group called Public Health and Medical Professionals for Transparency who want access to the data used by the FDA to approve Pfizer's COVID-19 inoculations. (The FDA asked in court to have over 50 years to release the documents.)
- One post marketing pharmacovigilance report submitted to the FDA, where Pfizer tracked real world adverse events occurring in the first 2.5 months after Emergency Use Authorization, was particularly disturbing.
 - Over 1,200 deaths
 - Over 25,000 nervous system adverse events
 - Under "Safety concerns" Pfizer listed Anaphylaxis and Vaccine-Associated **Enhanced Disease**
- This document should be incriminating for any agency who saw it and called these inoculations "safe."

Table 1. General Overview: Selected Characteristics of All Cases Received During the Reporting Interval

	Characteristics	Relevant cases (N=42086)
Gender	Female	29914
	Male	9182
	No Data	2990
Age range (years):	≤ 17	175*
0.01 -107 years	18-30	4953
Mean = 50.9 years	31-50	13886
n = 34952	51-64	7884
	65-74	3098
	≥ 75	5214
	Unknown	6876
Case outcome:	Recovered/Recovering	19582
	Recovered with sequelae	520
	Not recovered at the time of report	11361
	Fatal	1223
	Unknown	9400

Figure 1. Total Number of BNT162b2 AEs by System Organ Classes and Event



3.1.2. Summary of Safety Concerns in the US Pharmacovigilance Plan

Table 3. Safety concerns

Important identified risks	Amphytaxis
Important potential risks	Vaccine-Associated Enfanced Disease (VAED), Including Vaccine-associated Enhanced Respiratory Disease (VAERD)
Missing information	Use in Pregnancy and Instation Use in Prediatins Individuals <12 Years of Age Vaccine Effectiveness



CONSIDERABLE EVIDENCE OF CONFLICT OF INTEREST



PFIZER IS MAKING BILLIONS \$33.5B+ in 2021 alone.

When the incentive is such an astronomical sum of money, it only makes sense to ensure rigorous oversight of the process and to ensure as many safeguards as possible are in place.

Their agenda is their shareholders and their bottom line, not public health.

Forbes

Pfizer Expects \$33.5 Billion In Vaccine Revenue In 2021

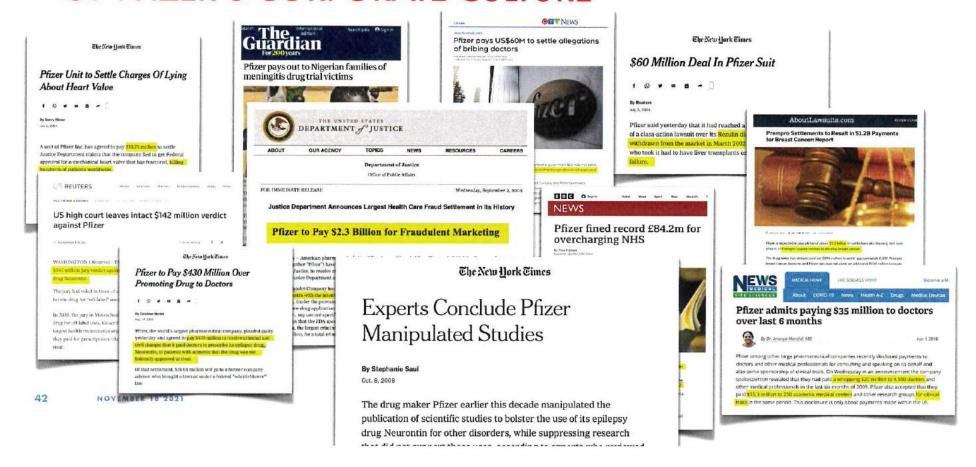


Albert Bourla, CEO of Pfizer, photographed in June 2020. JAMEL TOPPIN FOR FORBES

biotech giant Pfizer expects to generate \$33.5 billion in Covid-19 vaccine sales in 2021, up from previous estimates of \$26 billion, according to its second quarter earnings reports. These projections are based on the 2.1 billion doses of the Pfizer/BioNTech vaccine which the company expects to manufacture and deliver by the end of the year.



THE PUBLIC RECORD OF PFIZER'S CORPORATE CULTURE





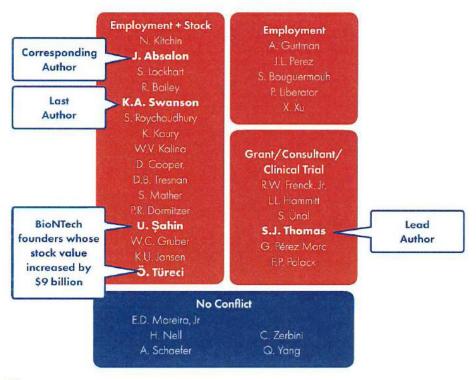
LINKS TO THE PUBLIC RECORD OF PFIZER'S CORPORATE CULTURE

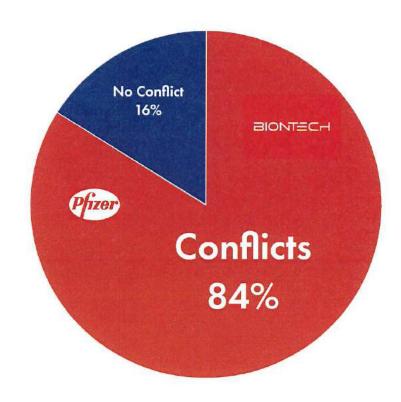
- Pfizer Unit to Settle Charges Of Lying About Heart Valve, Jul 2, 1994 https://www.nytimes.com/1994/07/02/business/pfizer-unit-to-settle-charges-of-lying-about-heart-valve.html
- Pfizer to Pay \$430 Million Over Promoting Drug to Doctors, May 14, 2004 https://www.nytimes.com/2004/05/14/business/pfizer-to-pay-430-million-over-promoting-drug-to-doctors.html
- \$60 Million Deal In Pfizer Suit over Rezulin, July 3, 2004 https://www.nytimes.com/2004/07/03/business/60-million-deal-in-pfizer-suit.html
- Experts Conclude Pfizer Manipulated Studies, Oct 8, 2008 https://www.nytimes.com/2008/10/08/health/research/08drug.html
- Pfizer to Pay \$2.3 Billion for Fraudulent Marketing, Sep 2, 2009 https://www.justice.gov/opa/pr/justice-department-announces-largest-health-care-fraud-settlement-its-history
- Pfizer Admits Paying \$35 Million to Doctors Over Last 6 Months, Apr 1, 2010 https://www.news-medical.net/news/20100401/Pfizer-admits-paying-2435-million-to-doctors-over-last-6-months.aspx
- Pfizer Pays Out to Nigerian Families of Meningitis Drug Trial Victims, Aug 12, 2011 https://www.theguardian.com/world/2011/aug/11/pfizer-nigeria-meningitis-drug-compensation
- Pfizer Pays U\$\$60M to Settle Allegations of Bribing Doctors, Aug 7, 2012 https://www.ctvnews.co/health/health-headlines/pfizer-pays-us-60m-to-settle-allegations-of-bribing-doctors-1.906216
- SEC Charges Pfizer with FCPA Violations, Aug 7, 2012 https://www.sec.gov/news/press-release/2012-2012-152htm
- US High Court Leaves Intact \$142 million Verdict Against Pfizer, Dec 9, 2013 https://www.reuters.com/orticle/us-usa-court-pfizer-idUSBRE9B80K020131209
- Pfizer Fined Record £84.2m for Overcharging NHS, Dec 7, 2016 https://www.bbc.com/news/business-38233852
- Sonofi, FSK, Pfizer, Boehringer Must Face Zantac Class-Action Lawsuits: Court Oct 15, 2021 https://medicaldialogues.in/news/industry/pharma/sonofi-gsk-pfizer-boehringer-must-face-zantac-class-action-lawsuits-court-83138



CONFLICTS OF INTEREST AMONG PFIZER REPORT AUTHORS

6 MONTH REPORT AUTHORS







THE CDC HAS REDEFINED "VACCINE" TO SUIT POLITICAL & PHARMACEUTICAL INTERESTS

For many years Jul 27, 2021 Aug 18, 2021 Starting Sep 2, 2021 CDC Definition of VACCINE Head of CDC Rochelle Walensky Joe Biden announced booster **CDC Definition of VACCINE** went on CNN and admitted the shots for all Americans. CHANGED "A product that stimulates a COVID-19 vaccines do not provide immunity - they don't stop person's immune system to "A preparation that is used to people from catching or stimulate the body's immune produce immunity to a specific Biden Announces COVID Vaccine Booster Shots for All Americans transmitting COVID-19. disease, protecting the person response against diseases." from that disease." This looks like fraud.

THE MEDIA HAS BEEN CAPTURED



https://rumble.com/voz64j-brought-to-you-by-pfizer.html



Pfizer has been **indemnified for damages** in case their inoculations hurt and kill people, and Pfizer **profits to the tune of billions** if the trials are successful.

No reasonable, responsible person would have given Pfizer carte blanche in such a situation.

Instead, you would engage in rigorous oversight and hold them to the highest scientific standards. This was not done.



CCRCA

THE INOCULATIONS SHOULD BE WITHDRAWN IMMEDIATELY

- It's clear that Pfizer and the agencies overseeing their trials failed to follow established,
 high quality safety and efficacy protocols right from the beginning.
- We have presented Level 1 evidence of harm from Pfizer's own trial data. Any
 government which has approved these inoculations, much less mandated them, knew or
 should have known from the available data that harm would be caused to
 its citizens.
- Any government that approved this medical intervention for its citizens should have ensured that the trial had used the appropriate clinical endpoints and high quality safety science.
- Any government official who possesses this evidence and continues to allow its citizens to be inoculated with a toxic agent is, at the very least, negligent.



RECOMMENDED READING/VIEWING

PUBLISHED PAPERS REFUTING PEIZER INOCULATIONS

- Why Are We Vaccinating Children Against COVID-19? https://www.sciencedirect.com/science/article/pii/S221475002100161
- US COVID-19 Vaccines Proven to Cause More Harm than Good Based on Pivotal Clinical Trial Data Analyzed Using the Proper Scientific Endpoint, "All Cause Severe Morbidity" https://www.scivisionpub.com/pdls/us-covid19-vaccines-proven-to-cause-more-harm-than-good-based-on-pivotal-clinical-trial-data-analyzed-usina-the-proper-scientific--1811.pdf

PFIZER'S NEJM PUBLISHED RESULTS

- Safety and Efficacy of the BNT162b2 mRNA Covid-19 Vaccine https://www.neim.org/doi/full/10.1056/neimoa2034577
- FDA Briefing Document, Dec 10, 2020 https://www.lda.gov/media/144245/download
- Safety and Efficacy of the BNT162b2 mRNA Covid-19 Vaccine through 6 Months https://www.nejm.org/doi/full/10.1056/NEJMoa2110345
- The 6 Month Supplementary Appendix https://www.nejm.org/doi/suppl/10.1056/NEIMoa2110345/suppl file/neimoa2110345_appendix.pdf

BRITISH MEDICAL JOURNAL

 Covid-19: Researcher blows the whistle on data integrity issues in Pfizer's vaccine trial https://www.bmj.com/content/375/bmj.n2635

ONTARIO PUBLIC HEALTH EPIDEMIOLOGICAL SUMMARY

Myocarditis and Pericarditis Following Vaccination with COVID-19
mRNA Vaccines in Ontario: December 13, 2020 to September 4, 2021
https://www.publichealthontario.ca/-/media/documents/ncov/epi/
covid-19-myocarditis-pericarditis-vaccines-epi.pdf?sc_lang=en

SHORT VIDEOS

- Informed Consent It's Your Right (3 minutes) https://rumble.com/yleq43-informed-consent-its-your-right.html
- Brought to You by Pfizer (1 minute) https://rumble.com/voz64j-brought-to-you-by-pfizer.html
- Why Do We Need Vaccine Passports? (2 minutes) https://rumble.com/vnlzaf-why-do-we-need-vaccine-passports.html
- COVID-19 Vaccines and D-Dimer levels (9 minutes) https://rumble.com/vaccines-and-d-dimer-leve.html
- How Reliable Is the PCR Test? (2 minutes) https://youtu.be/gL7Z5JmRIM4



WE NEED YOU TO HOLD THEM ACCOUNTABLE

- This evidence is a tool you can use. It represents a
 real opportunity to hold our leaders accountable as
 it is not opinion, or modelling, or real world
 evidence that can be dismissed or manipulated, but
 LEVEL 1 EVIDENCE from a randomized control
 trial. As such, it has high evidentiary value.
- We're asking that you call your MP and MPP and that you ask for a 1 hour meeting. Preferably in person, but Zoom will work too.
- During the meeting, play them the video and provide them with the PDF version. Ask them questions, like whether or not they were aware of all the issues with the Pfizer trial. Or what they plan to do now that they are. Get them to agree to a follow up meeting where they will provide you with answers.

- Share this video with friends and family. Have group viewing sessions on Zoom and discuss it.
- Share this video and the PDF on social media.
 When you do, please use the hashtags #CCCA and #MoreHarmThanGood
- Please join our mailing list at <u>www.canadiancovidcarealliance.org</u> and we will update you with additional evidence as we have it.
- Follow us on social media. This <u>linktree</u> has all our social accounts.
- This presentation is available in PDF and video format on our website at www.canadiancovidcarealliance.org

THE PFIZER INOCULATIONS FOR COVID-19

MORE HARM THAN GOOD







PUGET SOUNDKEEPER*



NTI Paper 7 www.nti.org

Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

About the Exercise

In March 2021, NTI conducted a Tabletop Exercise on Reducing High-Consequence Biological Threats, the third in a series of annual collaborations between NTI and the Munich Security Conference. The exercise examined gaps in national and international biosecurity and pandemic preparedness architectures and explored opportunities to improve capabilities to prevent and respond to high-consequence biological events. The exercise included 19 senior leaders and experts from across Africa, the Americas, Asia, and Europe with decades of combined experience in public health, biotechnology industry, international security, and philanthropy. (See the box on page 9 for the list of exercise participants.)

Exercise Scenario

Developed in consultation with technical and policy experts, the exercise scenario portrayed a deadly, global pandemic involving an unusual strain of monkeypox virus that first emerges in the fictional country of Brinia and eventually spreads globally. Later in the exercise, the scenario reveals that the initial outbreak was caused by a terrorist attack using a pathogen engineered in a laboratory with inadequate biosafety and biosecurity provisions and weak oversight. The exercise scenario concludes with more than three billion cases and 270 million fatalities globally. As part of the scenario development process, NTI conducted a virtual consultation with experts in December 2020. (See Appendix A for the list of participating experts.)



The fictional exercise scenario unfolded in a series of short news videos that participants reacted to.

The exercise was designed for participants to:

- Discuss requirements for international architectures related to science-based, early assessment of
 emerging pandemic risks and timely international warning and alerts for potential pandemics.
- Explore conditions that should trigger national pandemic response actions and discuss strategies
 and challenges for scaling public health interventions.
- Consider options to reduce biotechnology risks and strengthen oversight of dual-use bioscience research.
- Explore opportunities to strengthen international financing mechanisms to bolster global health security preparedness.

NTI Paper www.nti.org

Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats



May 2, 2022

Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

Dear WA State BOH,

We are the Friends of Toppenish Creek from Yakima County.

Friends of Toppenish Creek is dedicated to protecting the rights of rural communities and improving oversight of industrial agriculture. FOTC operates under the simple principle that all people deserve clean air, clean water and protection from abuse that results when profit is favored over people. FOTC works through public education, citizen investigations, research, legislation, special events, and direct action.

Regarding the draft rule WAC 246-203-130, please consider this strong objection. As written WAC 246-203-130 allows a CAFO dairy in Washington state to build a million gallon manure lagoon right next to a neighbor's home or well without consequences. Here is an explanation of how the draft rule condones such an assault on human health:

Draft WAC 246-203-130, section 3 says:

- (3) Unless a standard is superseded by a more stringent standard in federal, state, or municipal law, a person must meet the following standards in order to help prevent, control, and abate nuisance and health hazards related to the disposal of domestic animal waste. Except for free-range grazing, livestock trails, trail riding, and other diffuse sources of domestic animal waste, a person must:
 - (d) Handle domestic animal waste from livestock that is <u>collected and stockpiled</u> for later use or disposal as follows:
 - (i) Store the waste to control odors and attraction of flies, rodents, and other vectors;
 - (ii) Store the waste no longer than one year; and

(iii) Site the stockpile:

- (A) One hundred feet or more from a drinking water well;
- (B) Two hundred feet or more from a public drinking water spring;
- (C) Outside the sanitary control area of a public drinking water source if different from the areas set forth in (d)(iii)(A) and (B) of this subsection;
- (D) One hundred feet or more from a surface water body unless:
 - (I) The surface water body is upgradie at or is protected by a levee or other physical barrier; or
 - (II) The surface water body is protected by one or more control or treatment practices that capture and prevent leachate. Practices include, but are not limited to, storage pads, covers, storage structures, and filter strips; and
- (E) Outside seasonally or frequently flooded areas unless used or disposed of prior to flooding.

This <u>appears</u> to create strong protections for public health.

But look closer – there is a huge loophole in the proposed rule.

WAC 246-203-130, section 2 (j) says: "Stockpiling" means the temporary piling of domestic animal waste from livestock prior to use or disposal. <u>Stockpiling does not include active composting or lagoon storage of domestic animal waste from livestock.</u>

This more than wrong. This is a gift to the powerful interests that inflict morbidity and mortality on WA citizens by managing manure in ways that place profit above human health.

Unless the BOH can prove that a million gallon manure lagoon next to a family home does not damage the family's health, unless the BOH can prove that tossing manure into the ambient air to compost it does not damage the health of entire neighborhoods, then this loophole must, in all good conscience, be closed.

Sincerely,

Jean Mendoza

Executive Director, Friends of Toppenish Creek

3142 Signal Peak Road

can Mendeza

White Swan, WA 98952



STATE OF WASHINGTON DEPARTMENT OF HEALTH

DIVISION OF ENVIRONMENTAL PUBLIC HEALTH PO Box 47820 • Olympia, Washington 98504-7820 (360) 236-3000 • 711 Washington Relay Service

May 2, 2022

Mr. Keith Grellner, Chair Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

RE: Proposed rulemaking, WAC 246-203-130, Animal Waste, WSR 22-08-003

Dear Chair Grellner:

Thank you for the opportunity to provide comments on the proposed rule. This proposal modernizes a long-standing outdated rule. The Department of Health's Division of Environmental Public Health expects the proposal to result in better public health outcomes by giving our local health jurisdiction partners the necessary tools to address and resolve animal waste problems when called upon by the communities they serve.

Although we do not play a direct regulatory role in this rule proposal, we do have an interest in how the management of animal waste might impact those public health programs that we currently regulate. Most notably protecting wellhead sanitary control areas for public drinking water supplies, protecting shellfish harvesting areas from pollution due to hazardous surface run-off, protecting outdoor water recreation areas so they are safe for swimmers, and reducing harmful algal blooms in vulnerable bodies of water. Through collaboration with our local health jurisdictions, we believe that the proposed animal waste rule will better protect public health.

The proposed rule dovetails with our role and local health jurisdiction's role to protect public health, and compliments other state agency's regulatory roles and authorities to protect water and air quality.

We support the proposed amendments to WAC 246-203-130, Animal Waste rule.

Sincerely,

Lauren Jenks, MPH, CHES

Assistant Secretary

Environmental Public Health

Washington State Department of Health

Mr. Keith Grellner May 2, 2022 Page 2 of 2

cc: Joe Laxson, Washington Department of Health Michelle Davis, Washington State Board of Health



BACK COUNTRY HORSEMEN OF WASHINGTON PO Box 1132 ELLENSBURG, WA 98926 WWW.BCHW.ORG

April 28, 2022

Mr. Stuart Glasoe SBOH Health Policy Advisor

Mr. Glasoe and Board Staff,

We appreciate the task you have of revising the <u>Keeping of Animals</u> policy and also your language mitigation in response to our members' past concerns.

We are requesting that you delay putting the CR 102 Keeping of Animals Draft Policy Proposal on the June 8th agenda. There are many unresolved concerns. We also request time to form a stakeholder work group to address these concerns. The pandemic has caused delays and interruptions to many forms of business. Our members need time to work out the concerns in this draft policy.

Among the many concerns: mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officer), and more.

Thank you for your time, your consideration, and the opportunity to comment.

Sincerely,

Dana L Chembers

President

Back Country Horsemen of Washington

president@bchw.org

P.O. Box 96 ◆ Ellensburg, WA 98926 ◆ 509-925-9871 ◆ Fax 509-925-3004 WACATTLE@KVALLEY.COM ◆ WWW.WASHINGTONCATTLEMEN.ORG

To: Washington State Board of Health

Date: April 29th, 2022

Re: Keeping of Animals – WAC 246-203-130

Dear Members, Washington State Board of Health:

I was just briefed by our lobbyist that represents the Washington Cattlemen's Association in Olympia about the meeting he attended with legislators and your Chair and staff regarding **WAC 246-203-130 Keeping of Animals.**

While we acknowledge the Board's efforts to address grazing, we stand by our original assertion that this is unnecessary rulemaking on an already heavily regulated industry. In addition, we would point out the following:

Outreach on the Small Business Economic Impact Statement appears to be woefully inadequate – I cannot name one rancher that was reached out to on this issue, and I don't believe receiving 41 responses out of 1000 contacts really meets the straight-face test as far as stakeholder input.

Likely violates the state's Right to Farm law -

Unfortunately, in today's world, farmers and ranchers are often under attack from some in the environmental community, who don't seem to fully understand production agriculture. This has led to much consternation when urban-minded citizens move from city to country and don't find it to meet their idyllic vision. Fortunately, farmers and ranchers are protected by the state's 'Right to Farm" law. However, we fear this new proposal may be used as another tool to attempt to drag ranchers into court.

While we acknowledge the attempt to address grazing, there needs to be stakeholder input to clarify terms-

The current proposal references "free-range grazing", which is a term unfamiliar to us. We use the term "open-range grazing". In addition, an earlier version included pasture grazing and yet was removed from the current proposal. While open-range grazing would describe grazing where fences are built to keep livestock out, we would consider pasture grazing to describe fences being built to keep livestock in. This needs further discussion with stakeholders.

The WCA requests that the Board delay action on this proposed rule and create a workgroup with key stakeholders –

Rural citizens deserve a voice on the Board that can speak to agriculture and rural issues. We don't believe that currently exists. To balance that, we would request that a stakeholder workgroup that can

speak to the proposed rule with expertise in agriculture issues, be included as members of the workgroup.

Sincerely,

Jeff Keane

Jeff Keane, President Washington Cattlemen's Association



NTI Paper 31 www.nti.org

Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

About the Authors

Jaime M. Yassif, Ph.D.

Senior Fellow, Global Biological Policy and Programs, NTI

Dr. Jaime M. Yassif is Senior Fellow for Global Biological Policy and Programs at NTI, where she is leading several major biosecurity projects focused on strengthening governance of dual-use bioscience and reducing global catastrophic biological risks. Yassif previously served as a Program Officer at Open Philanthropy, where she led the Biosecurity and Pandemic Preparedness initiative. In this role, she recommended and managed approximately \$40 million in biosecurity grants, which rebuilt the field and supported work in several key areas, including developing new biosecurity programming at several leading think tanks, establishing the Global Health Security Index, initiating new biosecurity work in China and India, and framing a new public discourse about global catastrophic biological risks. Prior to this, Yassif served as a Science and Technology Policy Advisor at the U.S. Department of Defense and worked on the Global Health Security Agenda at the U.S. Department of Health and Human Services.

Kevin P. O'Prey, Ph.D.

Managing Partner, The Palisades Group, LLC

Dr. Kevin P. O'Prey has served as the facilitator for the annual Nuclear Threat Initiative's Biosecurity tabletop exercises at the Munich Security Conference. As Managing Partner at the Palisades Group, O'Prey oversees analytical and facilitation projects for the U.S. Federal Government, private sector, and international organizations. Previously, he was co-founder and president of Obsidian Analysis, Inc. and president of DFI Government Services. He earned his Ph.D. in political science at MIT's Security Studies Program.

Christopher R. Isaac, M.Sc.

Program Assistant, Global Biological Policy and Programs, NTI

Mr. Christopher R. Isaac is a Program Assistant for Global Biological Policy and Programs at NTI. Isaac has been involved with synthetic biology through the Internationally Genetically Engineered Machines (iGEM) Competition since the start of his scientific career and brings with him a mixture of skills in policy, biochemistry, and programming. Isaac holds a B.Sc. in Biological Sciences with a minor in Philosophy and a M.Sc. in Biochemistry (Bioinformatics) from the University of Lethbridge. He is an alumnus of the Emerging Leaders in Biosecurity Fellowship at the Johns Hopkins Center for Health Security and is a member of the iGEM Safety and Security Committee.

NTI Paper 5432 T 50 www.nti.org

III O



FOR IMMEDIATE RELEASE

April 18, 2022

Joint Statement Between the United States, Belize, Germany, Indonesia, and Senegal on the Announcement of the Second Global COVID-19 Summit

The United States as first COVID Summit Chair, Belize, as CARICOM Chair; Germany, holding the G7 Presidency; Indonesia, holding the G20 Presidency; and Senegal as African Union Chair, are pleased to announce we will co-host the second Global COVID-19 Summit, which will be held virtually on May 12, 2022. The Summit will redouble our collective efforts to end the acute phase of the COVID-19 pandemic and prepare for future health threats.

This Summit follows the first <u>Global COVID-19 Summit</u> convened by the United States on September 22, 2021. In advance of the May 12 Summit, we are calling on world leaders, members of civil society, non-governmental organizations, philanthropists, and the private sector to make new commitments and bring solutions to <u>vaccinate the world</u>, <u>save lives now</u>, <u>and build better health security</u> -- for everyone, everywhere.

The emergence and spread of new variants, like Omicron, have reinforced the need for a strategy aimed at controlling COVID-19 worldwide. Together, we can mitigate the impact of COVID-19 and protect those at the highest risk with vaccinations, testing, and treatments, actions to minimize disruption to routine health services, and through support for the ACT-Accelerator multilateral mechanism. We know we must prepare now to build, sustain, and finance the global capacity we need, not only for emerging COVID-19 variants, but also future health crises. To help achieve these goals, we urge all countries and stakeholders to pledge to take urgent actions to create the systems we need to end the acute phase of COVID-19, save lives, and build better health security and health systems.

The Summit will build on the themes and commitments made at the first Summit and will place an emphasis on supporting locally-led solutions to both immediate and long-term challenges, including:

- Getting shots into arms;
- Deploying tests and treatments, especially for the highest-risk populations;
- Expanding and protecting the health workforce and minimizing disruptions to routine and essential health services;
- Enhancing access to medical countermeasures, including research and development and scaling and diversifying local and regional manufacturing; and
- Generating sustainable financing for pandemic preparedness, health security, and health systems

We look forward to another successful Summit to continue the international effort in the fight against COVID-19 and to advance global pandemic preparedness.

P. D. Por 186 Chences Wa 99004

APX 17,2822

VA State Soard of Health

Temple, delpowe children the family, and the rights that protect



Expressions

P. D. BOX 186 Chences Wa 99004

RECEIVED

APR 10 2022 WA State Board of Health

Elisabeth, Please help support and protect or children. By not passing



Expressions

Hallmark

P. D. Box 186 Chancely Wa 99004

APR 1 8 ZOZZ

WA State Board of Health

the 13th a want you to support, help and



Expressions-

P. D. Copences War

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APH 18,2002

WA State Board of Health

Fran, et upu are able to help bupport, our children. you could be



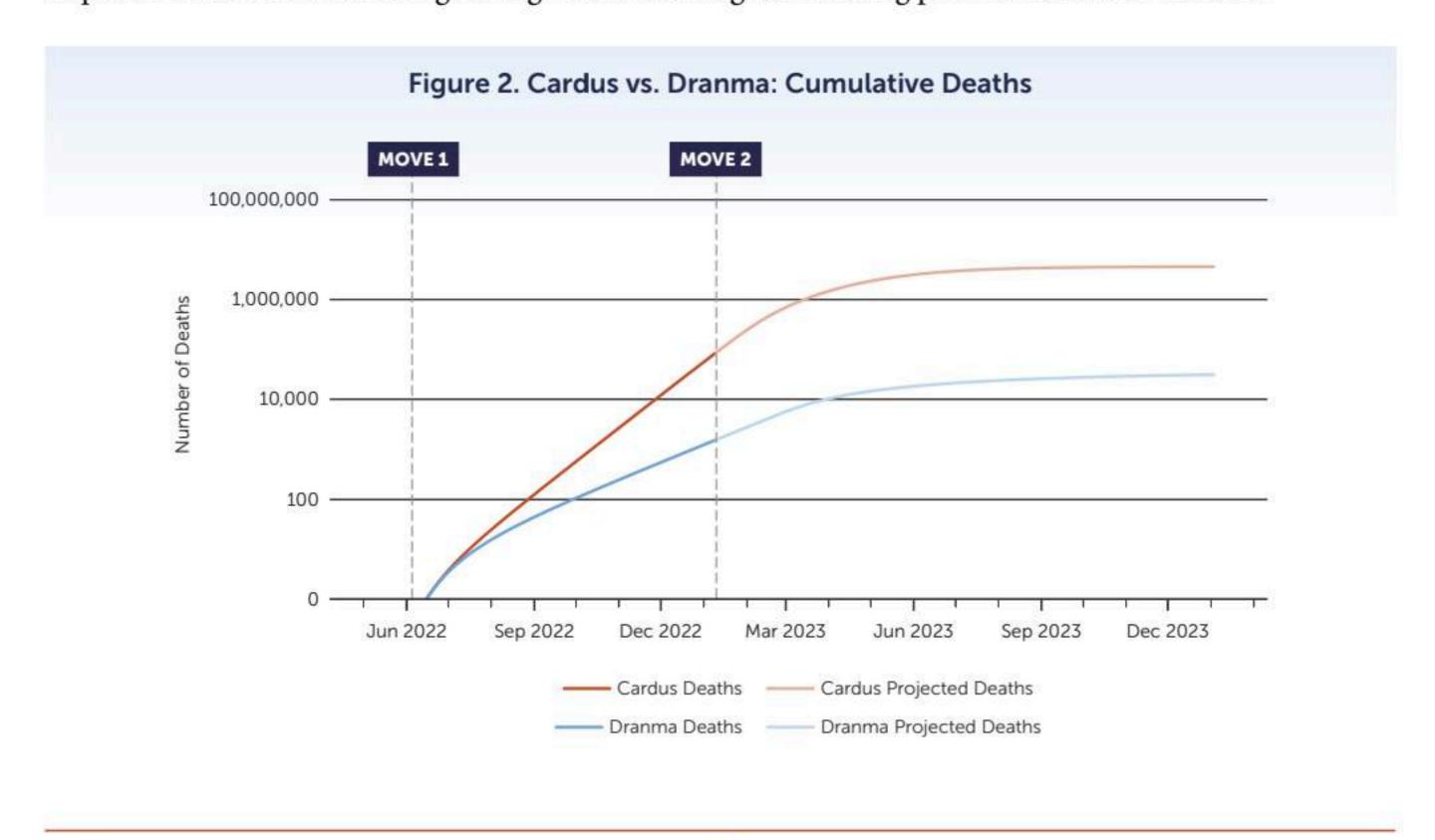
Expressions-

Move 1 (occurring on June 5, 2022, in scenario time) starts with an unusual outbreak of monkeypox in Brinia (population 250 million), with reports of 1,421 cases and four fatalities. There is no immediate evidence of international spread, but the outbreak takes place during a national holiday with extensive domestic and international travel by Brinians. Because monkeypox is not naturally found in Brinia, local and international experts consider this outbreak to be unusual. The Brinian government welcomes international outbreak investigations and requests medical support from the WHO. Genome sequencing of monkeypox patient samples reveals that the strain in Brinia contains mutations that make it resistant to existing vaccines.

The discussion that followed considered how the international system is postured to analyze initial indicators of pandemic risk and to communicate appropriate warnings.

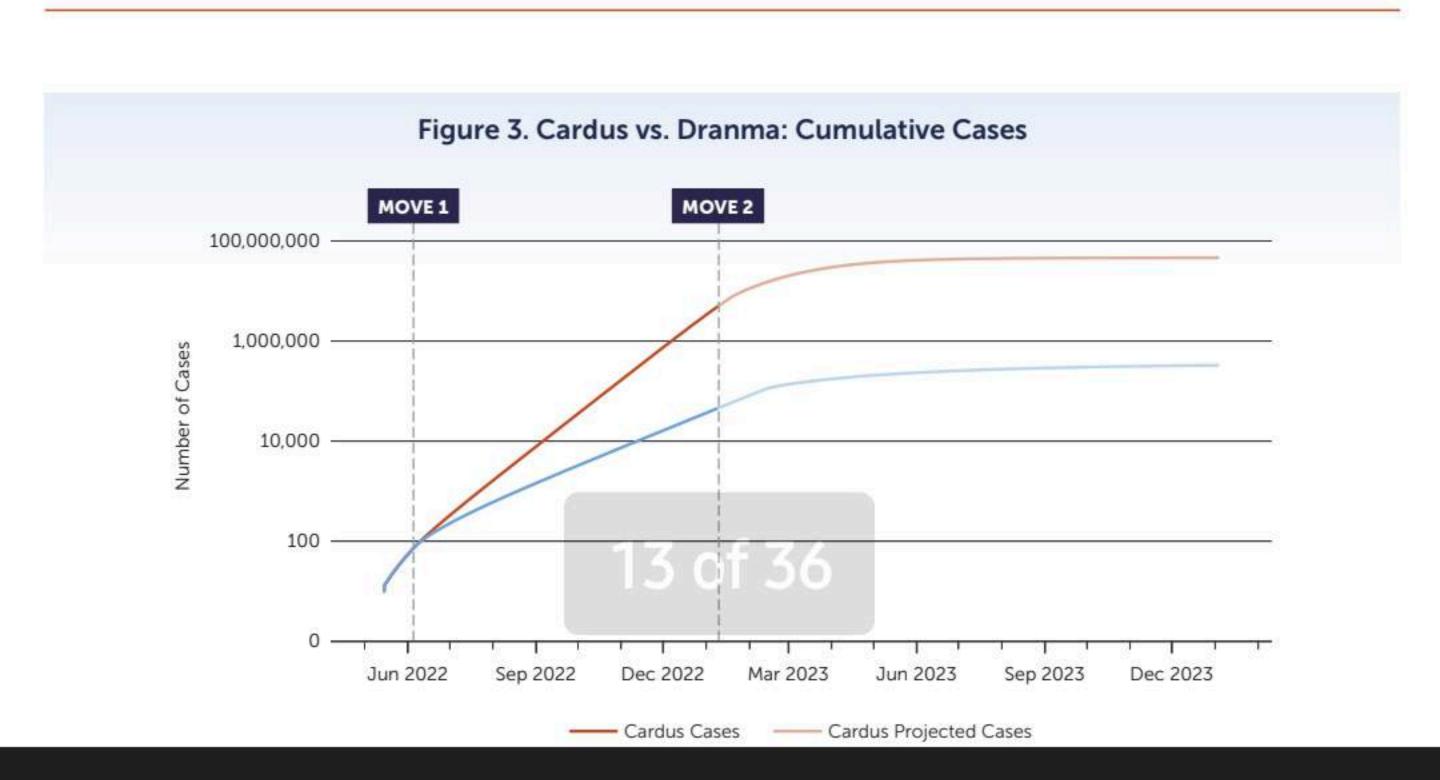
Move 2 (January 10, 2023) occurs six months later, at which point the virus has spread to 83 countries with 70 million reported cases, causing more than 1.3 million fatalities. With no known effective therapies or vaccines, countries have had to rely principally on non-pharmaceutical interventions (NPIs) to mitigate the impacts of the pandemic. Highlighting significantly different national outcomes in managing the pandemic, some governments, including the fictional Republic of Dranma, promptly adopted aggressive measures to slow virus transmission by shutting down mass gatherings, imposing social-distancing measures, and implementing mask mandates. These countries have also established large-scale testing and contact-tracing operations and scaled-up their health care systems to support anticipated growing case numbers. By contrast, the scenario depicts another group of countries, including fictional Cardus, that have prioritized keeping their economies open, undertaking little-to-no NPIs, and downplaying the virus and its potential impacts. These countries have experienced much worse outcomes in terms of illness and mortality (Figure 2) than those that responded early and energetically. As Figure 3 shows, Dranma experienced far fewer cases and fatalities than Cardus.

Participant discussion in Move 2 focused on exploring the conditions that should trigger national pandemic response actions and discussing strategies and challenges for scaling public health interventions.



NTI Paper 11 www.nti.org

Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats



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A COST BENEFIT-RISK ANALYSIS OF FLUORIDATION FOR THE WASHINGTON STATE BOARD OF HEALTH

"The continued increase in fluorosis rates in the U.S. indicates that additional measures need to be implemented to reduce its prevalence." Fluoridation (addition of fluoride to public water), cessation is the most logical source to reduce excess fluoride exposure.

Abstract/summary: The Washington State Department of Health (WSDH) has advised that the Washington State Board of Health (WSBH) has Jurisdiction in Washington State over the addition of fluoride to public water systems. Therefore, it is the ethical responsibility for the Board to be current on the risks and benefit, if any, for all individuals and protect the public with an appropriate label.

As a practicing comprehensive, cosmetic, general dentist, I treat functional and cosmetic damage from dental fluorosis and dental caries contributed by the WSBH's recommendation of fluoride supplementation in water. The estimated cost to treat dental fluorosis damage exceeds the estimated cost of benefit, Thus, fluoridation makes no financial, ethical, or Public Health sense. Excess fluoride exposure financially benefit dentists. When the estimated harm from developmental neurotoxicity is included, public health agencies must no longer support fluoridation. We can fix teeth, not brains.

¹ Wiener RC, Shen C, Findley P, Tan X, Sambamoorthi U. Dental Fluorosis over Time: A comparison of National Health and Nutrition Examination Survey data from 2001-2002 and 2011-2012. J Dent Hyg. 2018 Feb;92(1):23-29. PMID: 29500282; PMCID: PMC5929463.

Estimated costs Per Person Per Year (PPPY):

Cost to fluoridate water \$3-\$10

Averted caries \$6.08

Dental fluorosis Treatment \$3.24-\$153

IQ loss \$2,156 to \$2,552

Cost estimates report benefit from fluoridation only if harm is NOT included.

Real world estimates of fluoridation's benefit to teeth including all costs and also including harm from dental fluorosis to teeth, do not report a cost savings. Presumed neurotoxic harm to the developing brain, potential ADHD endocrine, cancer, thyroid, bone, enzymatic harm, and lack of environmental justice add additional costs which must be included in a cost-benefit-risk analysis. The evidence is clear, estimated fluoridation harm far exceeds estimated benefit.

Toxicology's definition of two terms: "hazard" and "risk." Sunshine can be beneficial. A hazard is potential danger, such as sunshine. Risk is the likely hood of danger/harm, or how much of the hazard causes danger/harm, such as a sunburn. How much sunshine becomes a danger depends on several factors and host sensitivity. "The dose makes the poison." (Perecles

Fluoride is similar. Topical fluoride can be beneficial. Ingesting fluoride has risk of danger and actual harm and the FDA approved label includes the warning "Do Not Swallow." Ingesting fluoride has strong evidence of actual harm. We cannot change the hazard of a chemical but we can manage the risk of harm. (See also for a simple review of toxicology)

Bioethics recommends we evaluate the risks from fluoridation based on "potential" risk at total exposures. Sometimes proponents of fluoridation speak only about the source of fluoride which comes from fluoridated water. However, an estimated third to two thirds of fluoride comes from other sources. The dosage fluoridation provides needs to be at least doubled or tripled to achieve total fluoride exposure.

Dental fluorosis is a known risk from excess fluoride exposure, the highest level of confidence.

Developmental neurotoxicity, as evaluated with IQ, is presumed to be a risk and also greater confidence than potential risk. "Potential" risks include ADHD, cancer, thyroid, bone, endocrine,

enzymatic system, mitochondria, GI and kidney harm and the evidence is strong enough for those to stop fluoridation. With 70% of the USA children having dental fluorosis, fluoridation should be stopped just for excess fluoride ingestion. Most developed countries do not fluoridate public water. Public Health's intention to help the poor and those with low intelligence are the very people least able to compensate for the harm and in most need of health education. Fluoridation is not supported by Bioethics, drug regulatory agencies, most developed countries, total exposure, quality of research, environmental justice, toxic substance laws, cost savings and better alternatives are available. Uncontrolled dosage, an uncertainty factor, individual sensitivity and the cumulative harm from all toxic chemical exposures demands action.

Individual dosage is not controlled when dispensed in the public water systems because not everyone drinks the same amount of water and different amounts at different ages. Infants on formula made with fluoridated water receive about 140 times more fluoride than mother's milk. Fluoride at 0.7 mg/l in water to make infant formula does not fit within WSBH guidelines within the first year of life.

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Current scientific evidence supports the USA Environmental Protection Agency (EPA) scientists statement in 2001:

"In summary, we hold that fluoridation is an unreasonable risk. That is, the toxicity of fluoride is so great and the purported benefits associated with it are so small - if there are any at all – that requiring every man, woman and child in America to ingest it borders on criminal behavior on the part of governments."

²Dr. J. William Hirzy, Senior Vice-President, Headquarters Union, US Environmental Protection Agency, March 26, 2001

I. BIOETHICS: Sound Bioethics Presupposes Sound Science.

I have previously requested the WSBH's cost-benefit-risk analysis and the Board has remained silent.

This report is the most up to date risk-benefit of fluoridation. The addition of fluoride to public water lacks individual consent, randomized controlled trials (quality research), lacks known mechanism of benefit, exceeds "potential" harm with probable and known harm, is without label, adulterated, misbranded and alternatives are available at less expense for those choosing to ingest fluoride.

Note: in contrast, topical fluoride has good scientific evidence of efficacy and the US Food and Drug Administration (FDA) correctly advises on the toothpaste label, "Do Not Swallow."

Since the 1940's bioethical principles have been reasonably constant.³

"The ethical validity of fluoridation policy does not stand up to scrutiny relative to the Nuremberg Code and other codes of medical ethics, including the Council of Europe's Biomedical Convention of 1999" 4 and artificial water fluoridation must be abandoned.⁵

Dental caries harms the individual, not others. Not to minimize discomfort and harm from dental caries, but dental treatment is sometimes considered elective as a "non-contagious infectious disease" and not highly lethal.

In both clinical practice and research,⁷ individual informed consent and autonomy of a competent individual is a self-evident bioethic principle. In contrast, public health interventions may not have individual informed consent and therefore need to be held to an even higher standard of confidence.

³Grady C. Institutional Review Boards: Purpose and Challenges. *Chest.* 2015;148(5):1148-1155. doi:10.1378/chest.15-0706

⁴Douglas W. Cross & Robert J. Carton (2003) Fluoridation: A Violation of Medical Ethics and Human Rights, International Journal of Occupational and Environmental Health, 9:1, 24-29, DOI: 10.1179/107735203800328830

⁵Rajarajan, Giftson; Kumar, R. Pradeep; Priyadorshini, S. Pavithra, A review on the ethics of artificial water fluoridation. Drug Invention Today . Jan2019, Vol. 11 Issue 1, p102-107. 6p. 1 Chart

⁶Vieira, AR, Genetics and Caries- Prospects, Braz Oral Res., (São Paulo) 2012;26(Spec Iss 1):7-9

⁷⁴⁵ CFR part 46 Subpart D §46.404. "§46.116 General requirements for informed consent. (2) A description of any reasonably foreseeable risks or discomforts to the subject;"

For example, a clinician making an error may harm that patient. Research error may harm hundreds. WSBH error may harm hundreds of thousands.

The Nuffield Council is consistent with the CDC (Centers for Disease Control and Prevention) ethics, applicable to the WSBH and is more specific to fluoridation, advising:

"public health policy involving the water supply should be considered in relation to:

- I. the balance of risks and benefits
- II. the potential for alternatives that rank lower on the intervention to achieve the same outcome.
- III. the role of consent where there are potential harms"8 (emphasis supplied)

Bioethics does not include minimizing evidence of risk and maximizing claims of benefit. The public rely on the WSBH's recommendations in their decision making process regarding fluoridation. To avoid very serious harm to hundreds of thousands, the WSBH must have high confidence in their review of empirical evidence as it develops on fluoride ingestion.

⁸Ethics Consultation Report Ethical Considerations in Community Water Fluoridation, by the Public Health Agency of Canada's Public Health Ethics Consultative Group, December 18, 2018 p.2.https://www.caphd.ca/sites/default/files/Ethical%20Considerations%20for%20Community%20Water%20Fluoridation.pdf

II. Jurisdiction: No Agency Authorized to Approve Fluoride Ingestion with Intent to Prevent Dental Caries has published a Benefit Risk Analysis or Approved Fluoridation

FDA: In the USA, Congress has given the Food and Drug Administration (FDA) jurisdiction over substances used with the intent to prevent disease such as fluoride. The FDA testified to Congress that fluoride is a drug. Fluoride toothpaste is approved and has a label with warning, "Do Not Swallow," referring to a pea size amount, 0.25 mg, the same amount as a glass of fluoridated water. Clearly the public is receiving mixed messages, "Do Not Swallow" the same amount of fluoride administered without choice in each glass of public water. We should not be surprised the public opinion is polarized. Sodium fluoride is listed as a drug in the Pharmacopeias.

The FDA notified 35 fluoride manufacturers of fluoride supplements, ". . . . there is no substantial evidence of drug effectiveness as prescribed, recommended or suggested in its labeling. . . marketing is in violation of the new drug provisions of the Federal Food, Drug, and Cosmetic Act; they have, therefore, requested that marketing of these products be discontinued." ¹¹ The FDA more recently warned manufacturers of fluoride supplements their product is not approved.

Fluoridated bottled water did not go through the NDA process and has never been approved. The FDA was notified a health claim would be made by manufacturers and the Drug section of the FDA does not regulate bottled water.

WASHINGTON STATE: In Washington State, the Board of Pharmacy (WSBP) has (had) jurisdiction over determining whether fluoride is a drug and the WSBH has jurisdiction over dispensing the fluoride drug. When asked, the WSBP confirmed, fluoride is a drug.¹² In fact, the Washington State laws gave the WSBH little choice.

RCW 69.38.010 "Poison" defined. As used in this chapter "poison" means:

(1) Arsenic and its preparations;

(2) Cyanide and its preparations, including hydrocyanic acid; Strychnine; and

(3) (4) Any

other substance designated by the state board of pharmacy which, when introduced into the human body in quantities of sixty grains or less, causes violent sickness or death."

⁹21 USC 321 (g)(1)(B)

¹⁰Congressional Investigation 2001

¹¹DRUG THERAPY 1975

¹²Letter to the Author Bill Osmunson, June 4, 2009, from the Washington State Board of Health

Sixty grains is 3,887 mg.

Whitford (1996) "it may be concluded that if a child ingests a fluoride dose in excess of 15 mg F/kg, then death is likely to occur. A dose as low as 5 mg F/kg may be fatal for some children. Therefore, the probably toxic dose (PTD), defined as the threshold dose that could cause serious or life-threatening systemic signs and symptoms and that should trigger immediate emergency treatment and hospitalization, is 5 mg F/kg." ¹³

For a 5 kg child a presumed lethal dose could be 25 mg. The WSBP had a simple calculation to make, is 25 mg less than 3,887 mg? Of course 25 is less than 3,887 and therefore fluoride is a poison. However, fluoride is exempt from poison laws when regulated under either pesticide or drug laws. The WSBP correctly determined fluoride is a drug when used with the intent to prevent disease in humans and not a pesticide. RCW does not exempt poisons when regulated as foods. In fact, the intentional dispensing of poisons into water is prohibited.

Fluoride is not exempt from poison laws when regulated as a food.

The jurisdiction of fluoride is then kicked over to the FDA which has not approved fluoride as a drug and to the WSBH which after 15 years of petitions has remained silent or denied petitions to protect the public.

RCW <u>57.08.012</u> Authorizes fluoridation by vote of commissioners or electors. In effect, the complex scientific toxicology, pharmacology, epidemiology, physiology, biochemistry, dentistry and medicine is turned over to 50% of a person's neighbors to medicate everyone with an unapproved drug.

Although the WSBH has remained silent, the Board certainly has the responsibility to protect the public at a minimum with appropriate label and recommendation.

The FDA process for evaluating a new drug should be considered by the WSBH and includes a benefit-dose-risk analysis with randomized controlled trials, label and oversight. The manufacturer before marketing presents the research on efficacy at a specific dosage to the FDA. If the substance is effective at the dosage, the risks are evaluated and a label is made with dose and warnings.¹⁴ The WSBH has a role in fluoridation and must protect the public.

¹³ Whitford G. (1996). Fluoride Toxicology and Health Effects. In: Fejerskov O, Ekstrand J, Burt B, Eds. <u>Fluoride in Dentistry</u>, 2nd Edition. Munksquard, Denmark. p 171."

¹⁴FDA Development & Approval Process Drugs, Center for Drug Evaluation and Research, https://www.fda.gov/drugs/development-approval-process-drugs

EPA: The Safe Drinking Water Act¹⁵ includes, "No national primary drinking water regulation may require the addition of any substance for preventive health care purposes unrelated to contamination of drinking water." Congress has prohibited the EPA from adding anything to water which has intent to prevent disease.¹⁶

The Environmental Protection Agency (EPA) advised, "the FDA, remains responsible for regulating the addition of drugs to the water supply for health care purposes."17

The FDA avoids their responsibility by claiming the FDA does not regulate public water. In effect, no USA Federal Agency accepts jurisdiction over the addition of fluoride to public water, fluoridation, determining the efficacy, dosage and safety of ingested fluoride. The CDC does not evaluate or approve drugs. The WSBH is mistaken to rely on any Federally authorized agency for determining benefit, dosage, risk and label. Private industry promotes fluoridation for their benefit and has persuaded public health agencies to agree.

Proponents reference endorsements of fluoridation by over 100 organizations and claim, "Not a single credibly recognized scientific group in the world OPPOSES community water fluoridation." 18 However, their definition of "world" appears to be parochial and limited primarily to English speaking Countries and any organization opposed to fluoridation is therefore not credible.

Austria: "toxic fluorides" NOT added

Belgium: encourages self-determination – those who want fluoride should get it themselves. Finland: "...do not favor or recommend fluoridation of drinking water. There are better ways of providing the fluoride our teeth need." A recent study found ... "no indication of an increasing trend of caries...."

Germany: stopped fluoridation. A recent study found no evidence of an increasing trend of caries Denmark: "...toxic fluorides have never been added to the public water supplies in Denmark." Norway: "...drinking water should not be fluoridated"

Sweden: "not allowed". No safety data available!

¹⁵⁴² U.S. Code § 300g–1 - National drinking water regulations

¹⁶FOIA Request HQ-FOI-01418-10

¹⁷Steve Neugeboren, Ass. General Counsel, Water Law Office EPA 2/14/2013

¹⁸American Fluoridation Society https://americanfluoridationsociety.org/debunking-anti-claims/myths/supportingorganizations/

Netherlands: Inevitably, whenever there is a court decision against fluoridation, the dental lobby pushes to have the judgment overturned on a technicality or they try to get the laws changed to legalize it. Their tactics didn't work in the vast majority of Europe.

Hungary: stopped for technical reasons in the '60s. However, despite technological advances, Hungary remains unfluoridated.

Japan: "...may cause health problems...." The 0.8 -1.5 mg regulated level is for calcium-fluoride, not the hazardous waste by product which is added with artificial fluoridation.

<u>Israel:</u> suspended mandatory fluoridation until the issue is reexamined from all aspects.: June 21, 2006 "The labor, welfare and health Knesset committee"

China: "not allowed"

Regarding Fluoride Post-harvest fumigant, and applicable to fluoridation, an EPA administrative Judge concluded: "EPA agrees that aggregate exposure to fluoride . . . does not meet the safety standard in FFDCA section 408. The fluoride MCLG (4.0 mg/L) is not protective of the effects of fluoride on teeth and bones; The fluoride MCLG is not protective of other neurotoxic, endocrine, and renal effects of fluoride; EPA has not adequately protected children; EPA cannot determine the safety of sulfuryl fluoride and fluoride in the absence of a developmental neurotoxicity study; EPA has underestimated exposure to fluoride; and EPA has committed procedural errors in violation of the Administrative Procedures Act (APA) (5 U.S.C. 551 et seq.)."19

Fluoride is not listed in food labels and no approved label for fluoridation or products used with fluoridated water are listed with warnings. Fluoridation is not an approved drug and is without label, misbranded,²⁰ and adulterated²¹ failing to conform to compendium standards of purity.

The absence of fluoride in the diet does not cause dental caries. Fluoride is not an essential nutrient. Dental caries are not caused by inadequate fluoride ingestion.²² No physiologic process in the body requires fluoride. Fluoride ingestion should not be compared to essential vitamins or minerals required for metabolic functions, the absence of which causes a disease.

¹⁹https://www.federalregister.gov/articles/2011/01/19/2011-917/sulfuryl-fluoride-proposed-order-granting-objections-to-tolerances-and-denying-request-for-a-stay
Consolidated Objections at http://www.fluoridealert.org/wp-content/uploads/sf-nov.2006.pdf.

Consolidated Objections at http://www.nuorideatert.org/wp-content/uproads/s1-nov.2000.pdf.

²⁰FDA misbranded. https://www.fda.gov/medical-devices/general-device-labeling-requirements/labeling-requirements-misbranding

²¹Section 501(b) of the Food, Drug, and Cosmetic Act https://www.fda.gov/media/71979/download

²²Emsley J, Jones DJ, Miller JM, Overill RE, Waddilove RA. An unexpectedly strong hydrogen bond: ab initio calculations and spectroscopic studies of amide-fluoride systems. *Journal of the American Chemical Society.* 1981;103:24–28. [Google Scholar]

III. COSTS TO FLUORIDATE WATER.

Ran²³ reported costs to fluoridate water from \$0.11 to \$4.92 in 2013 U.S dollars per person per year (PPPY).

Ko²⁴ corrected for more factors and reported costs to fluoridate water ranged from "about \$10 and \$3 PPPY." Because Ko's estimate considers real world costs it will be used here.

Costs to purchase the bottled water for those not wanting fluoride should also be added to the costs of fluoridation. Assuming even 1% of the bottled water consumed is to avoid fluoride, 150 million gallons or 568 million liters of bottled water at \$1/liter adds an additional \$568 million dollars to the cost of fluoridation. An additional \$5 per person consuming the fluoridated water costs to fluoridate public water should be added. To keep this complex subject simple, I have stuck with Ko's estimate.

²³ Ran T, Chattopadhyay SK; Community Preventive Services Task Force. Economic Evaluation of Community Water Fluoridation: A Community Guide Systematic Review. *Am J Prev Med*. 2016;50(6):790-796. doi:10.1016/j.amepre.2015.10.014

²⁴ Ko L, Thiessen KM, A critique of recent economic evaluations of community water fluoridation, International Journal of Occupational and Environmental Health 2015 vol. 21 No. 2 91 DOI 10.1179/2049396714Y.0000000093

IV. BENEFIT of FLUORIDATION.

Ko has the most inclusive and accurate estimation of dental caries mitigation and reports fluoridation savings of \$6.08 PPPY (\$3-\$10 PPPY), which is used here. Serious limitations to the alleged benefit of fluoride ingestion must be noted.

1) No Known Mechanism

Mechanism: Fluoride works by interacting topically after teeth erupt. The evidence for its effectiveness when applied to erupted teeth is well supported. Fluoride incorporation into developing teeth is very minor and does not contribute to caries prevention. Fluoride is not a nutrient nor essential for any bodily function. A very small amount of ingested fluoride makes its way to saliva to provide some topical fluoride after tooth eruption, but this amount is 50 to 100 fold less than what is obtained from fluoride naturally occurring in food and beverages. "The enamel demonstrated significant transport hindrance for the ions, and the effective pore radii of the transport pathways in the enamel were found to be approximately 0.7-0.9 nm."²⁵

2) No Randomized Controlled Trials (RCT)

No RCT of fluoridation or fluoride supplements as pills or liquid have been published for infants, children or adults The only published RCT²⁶ gave 1 mg of fluoride daily to pregnant mothers and followed their child till age 5. No statistical reduction in dental caries was reported. The first RCT has started for fluoridated bottled water.²⁷

Without a known mechanism coupled with lack of RCTs, the FDA is correct determining the evidence of benefit from fluoride ingestion is "incomplete."

²⁵Wei Ren, Arif Baig, S Kevin Li, Passive and iontophoretic transport of fluorides across enamel in vitro., Journal of pharmaceutical sciences (2014-04-10) Millipore Sigma

²⁶Leverett DH, Adair SM, Vaughan BW, et al, - Caries Research, 1997 - karger.com https://www.karger.com/Article/Abstract/262394#

²⁷https://waterbeststudy.com

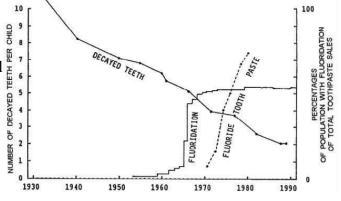
3) Limited Confidence in Current Fluoridation's Association with Dental Caries:

- A. Not one Study corrects for Unknown Confounding Factors such as the highly significant unknown causing caries decline from about 11.5 cavities to about 5.5 cavities before fluoridation.
- B. Not one Prospective Randomized Controlled Trial
- C. Socioeconomic status not controlled
- D. Inadequate size
- E. Difficulty in diagnosing decay
- F. Delay in tooth eruption not controlled
- G. Diet: Vitamin D, calcium, strontium, sugar, fresh and frozen year-round vegetables and fruit consumption not controlled.
- H. Total exposure of Fluoride not determined
- I. Oral hygiene not determined
- J. Not evaluating Life-time benefit
- K. Estimating or assuming subject actually drinks the water (about half of water ingested is now bottled water.)²⁸
- L. Dental treatment expenses not considered
- M. Mother's F exposure, Breast fed (almost no fluoride) and infant formula with a high dose of fluoride
- N. Fraud, gross errors, and bias not corrected.
- O. Genetics not considered

For example, Colquhoun²⁹ 1997 ISFR Published 1998 published the graph below. No one knows

what the unknown(s) were reducing caries prior to fluoridation. Those powerful unknowns have never been controlled for in research. The unknowns are more powerful than the possible effect of fluoridation.

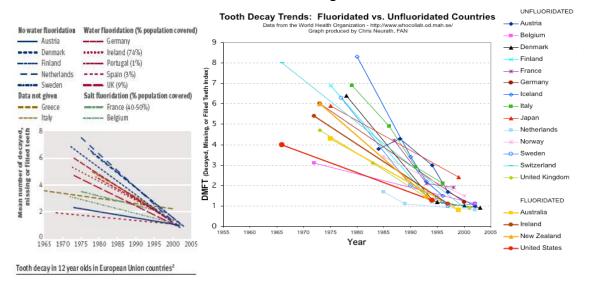
Highly unlikely the unknowns causing the caries decline could have gradually phased out while fluoridation was phased in.



²⁸International Bottled Water Association. https://bottledwater.org/bottled-water-consumption-shift/

²⁹Colquhoun 1997 ISFR Published 1998 http://www.fluoride-journal.com/98-31-2/312103-f.htm

Cheng³⁰ (left graph below) and Neurath³¹ using WHO data demonstrate in developed countries, dental caries have declined to similar low levels regardless of fluoridation or fluoridated salt.



4) No Known Effective Dosage

Without RCT published studies or FDA approval, the dosage mg/Kg/day to mitigate dental caries has never been determined. Concentration of fluoride in water is not dosage. Instead of a dosage, an Adequate Intake is used by the National Institute of Health.³²

Historical research suggested fluoridation was "remarkably effective," however, current research is less confident. A major review in 2000 from the Centre for Reviews and Dissemination at the University of York (York Review) concluded that the best available evidence suggested that fluoridation reduced the prevalence of caries, but found that the reduction was difficult to quantify from the evidence available. The authors also noted, "it is surprising to find that little high quality research has been undertaken."³³

³⁰Cheng, K. K., Chalmers, I., & Sheldon, T. A. (2007). Adding fluoride to water supplies. *BMJ (Clinical research ed.)*, *335*(7622), 699–702. https://doi.org/10.1136/bmj.39318.562951.BE

³¹Neurath C, TOOTH DECAY TRENDS FOR 12 YEAR OLDS IN NONFLUORIDATED AND FLUORIDATED COUNTRIES, Research Note Fluoride 38(4)324-325 November 2005.

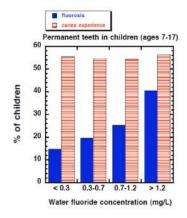
³² National Institute of Health. AI for Fluoride https://ods.od.nih.gov/factsheets/Fluoride-HealthProfessional/#:~:text=In%201986%2C%20guidelines%20from%20the%20U.S. %20Environmental%20Protection,to%20prevent%20dental%20fluorosis%20%5B%203%2C%2011%20%5D. Accessed May 17, 2022

³³McDonagh M, Whiting P, Bradley M et al. (2000) A Systematic Review of Public Water Fluoridation (York: NHS Centre for Reviews and Dissemination).

"The results show that the reviewed original studies on economic evaluation of caries prevention do not provide support for the economic value of caries prevention."³⁴

Iida et al data from 2009 demonstrates an increase in fluoride concentration increases dental fluorosis, blue lines, but caries experience is minor if any. (Graph of data by Thiessen)

lida, H., and Kumar, J.V. 2009. The association between enamel fluorosis and dental caries in U.S. schoolchildren. JADA 140:855-862.



Little has changed with fluoridation. According to Dye et al. (2015): "Untreated tooth decay was higher for Hispanic (36%) and non-Hispanic black (42%) adults compared with

non-Hispanic white (22%) and non-Hispanic Asian (17%) adults aged 20-64."

Cities fluoridated for over 50 years report a crisis of dental caries and Kentucky was awarded 50 years of 100% fluoridated by the American Dental Association at the same time Kentucky was number one percentage for those without any teeth.

5) Excess exposure. 70% of children are ingesting too much fluoride.

CDC "Dental fluorosis only occurs when younger children consume too much fluoride, . . . when teeth are developing under the gums." Fluoride ingestion prior to 6 years of age causes dental fluorosis.

Water fluoride concentration is not an individual dose, nor a valid indication of total exposure. Fluoridation gives more to everyone regardless of how much they are ingesting from other sources. Although the average intake of water is estimated at 927 ml/day for adults, 90th per-

³⁴Källestål C et al. Economic evaluation of dental caries prevention: a systematic review. Acta Odontol Scand. 2003 Dec;61(6):341-6.

³⁵http://www.cdc.gov/fluoridation/safety/dental_fluorosis.htm#a2 Accessed 10 15

centile is just over 2 liters and some drink over 10 liters/day.³⁶ To protect from potential harm, safety factor of 10 should be used just to protect those drinking the most water such as pregnant women and infants on formula made with fluoridated water.

Rates of dental fluorosis have increased from 10-15% to 70%, moderate/severe from 7% to 28% in the latest NHANES reports.³⁷ Dong's 2015-16³⁸ reporting 70% although lower moderate and sever percentage. Espinoza raised concern with the quality of data³⁹ which has Federal oversight and funding. Photographs were taken and could confirm data quality if released. Data was when fluoridation was at about 1 ppm in water. An estimated 15% decrease in total exposure may reduce the rate of dental fluorosis, but not enough.

In other words, 73% of children are on fluoridated water and 70% of all the children show signs of excess fluoride intake. When fluoridation started, the public was assured only perhaps 15% of the public would get dental fluorosis.

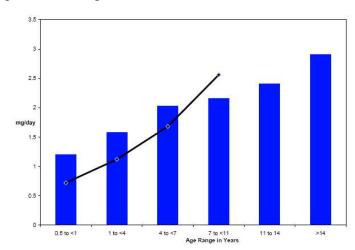


Figure 8-1. Total Daily Fluoride Intake Estimates Relative to the Proposed RfD Using 90th Percentile Drinking Water Intake Data for Consumers Only and the Mean Drinking Water Fluoride Concentration (0.87 mg/L)

There are numerous sources of fluoride, ". . . some children probably get more than the recommended amount of fluoride from toothpaste alone. . . "40 p 42.

The EPA Dose Response Analysis 2010, Figure 8-1, illustrates the percentage of children exceeding the RfD (EPA safe dose) if the EPA increased the RfD from 0.06 to 0.08 mg/kg/day.

³⁶Fluoride in Drinking Water: A Scientific Review of EPA's Standards, 2016. Chapter 2, pp 23-88.

³⁷Neurath C, Limeback H, Osmunson B, Connett M, Kanter V, Wells CR. Dental Fluorosis Trends in US Oral Health Surveys: 1986 to 2012. JDR Clin Trans Res. 2019 Oct;4(4):298-308. doi: 10.1177/2380084419830957. Epub 2019 Mar 6. PMID: 30931722.

³⁸Dong H, Yang X, Zhang S, Wang X, Guo C, Zhang X, Ma J, Niu P, Chen T. Associations of low level of fluoride exposure with dental fluorosis among U.S. children and adolescents, NHANES 2015-2016. Ecotoxicol Environ Saf. 2021 Sep 15;221:112439. doi: 10.1016/j.ecoenv.2021.112439. Epub 2021 Jun 22. PMID: 34166938.

³⁹ Lorena Espinoza Rachel Kaufmann, Corresondence Letter, Ecotoxicology and Environmental Safety, Volume 227, 20 December 2021, 112950 https://doi.org/10.1016/j.ecoenv.2021.112950 https://www.sciencedirect.com/science/article/pii/S0147651321010629?via%3Dihub

⁴⁰National Research Council 2006 p. 42.

In other words, EPA is doing the opposite of the NRC 2006 recommendation which reported EPA standards are not protective. EPA is "declaring" fluoride exposure safer and is being less protective. Even with increasing RfD, too many children are still ingest too much fluoride. (Percentage above the black line, previous page.)

Note, in their Figure 8-1 infants are not included, 10% of children and infants ingesting the most fluoride are not included.

The National Institute of Health⁴¹ rec-

ommends 0.01 mg/day of fluoride birth to 6 months, compared to mother's milk with mean 0.004 mg/l. Formula fed babies on fluoridated water ingest an estimated average of 140 times more fluoride than breast fed babies.

I was unable to locate WHO's recommendation for fluoride concentration of water used to make infant formula and appears to be 1.5 mg/l.

Fluoride from tap water -babies fed formula made with fluoridated tap water are overdosed on fluoride

subject	volume fluid intake	fluoride concentration in liquid consumed	fluoride DOSAGE* (µg/ kg per day)	
5 kg baby fed breast milk	up to 1 L	≈ 0.005 ppm	1	
70 kg adult	1 L	0.7 ppm	10	
70 kg adult	4 L	0.7 ppm	40	
70 kg adult	2 L	2.0 ppm	57	
70 kg adult	1 L	4.0 ppm	57	
5 kg baby fed infant formula made with tap water	up to 1 L	0.7 ppm	140	

^{*}A dose refers to a specified amount of medication taken at one time.

By contrast, dosage is the prescribed administration of a specific amount, number, and frequency of doses over a specific period of time. AMA Manual of Style

Zohoori⁴² "In conclusion, a relatively large proportion of fluoride intake is retained in the body in weaned infants."

⁴¹ National Institute of Health. AI for Fluoride https://ods.od.nih.gov/factsheets/Fluoride-HealthProfessional/#:~:text=In%201986%2C%20guidelines%20from%20the%20U.S.

^{%20}Environmental%20Protection,to%20prevent%20dental%20fluorosis%20%5B%203%2C%2011%20%5D. Accessed May 17, 2022

⁴² Zohoori, F., Omid, N., Sanderson, R., Valentine, R., & Maguire, A. (2019). Fluoride retention in infants living in fluoridated and non-fluoridated areas: Effects of weaning. *British Journal of Nutrition*, *121*(1), 74-81. doi:10.1017/S0007114518003008

6) Lack of Label.

Drugs and processed foods have labels to tell consumers recommendations and warnings. Without label, consumers don't know how much fluoride is in their foods such as mechanically deboned meat, tea, grapes etc. The only label is on fluoride toothpaste with a warning, "Do Not Swallow."

7) Systematic reviews of benefit

"Five systematic reviews between 2000 and 2015 that fluoridation reduces dental caries in children."⁴³ However, evidence of efficacy is based mostly on historical studies and lower quality.

The Cochrane systematic review is applicable to public health policy for the precise reasons it is criticized. Critics suggest the review was too restrictive.⁴⁴ Cochrane reviews primarily evaluate RCTs "for new drugs and clinical interventions for use with individuals, not public health initiatives targeted at populations."⁴⁵ Bioethics of a policy without individual consent should be more protective than one with individual consent and under their doctor's supervision. The FDA appears to be even more restrictive than the Cochrane review, reporting evidence at the same time period prior to the mid 1970's was "incomplete". Without individual consent and a world wide policy, WHO should require the same or greater confidence in the evidence.

The Cochrane review raised concerns for lack of studies to determine; current benefit, lack of benefit for lower socioeconomic status, lack of risk with fluoridation cessation, 97% of studies at high risk of bias, substantial between-study variation, and no studies met their criteria to determine effectiveness for adults.⁴⁶ Harm was not considered.

⁴³Lennon, M. The cochrane review of water fluoridation, Editorial, Community Dental Health (2015) **32**, 130–131

⁴⁴Rugg-Gunn, A., Spencer, A., Whelton, H. *et al.* Critique of the review of 'Water fluoridation for the prevention of dental caries' published by the Cochrane Collaboration in 2015. *Br Dent J* **220,** 335–340 (2016). https://doi.org/10.1038/sj.bdj.2016.257

⁴⁵Lennon, M. The cochrane review of water fluoridation, Editorial, Community Dental Health (2015) 32, 130–131

⁴⁶Iheozor-Ejiofor Z, Worthington HV, Walsh T, O'Malley L, Clarkson JE, Macey R, Alam R, Tugwell P, Welch V, Glenny AM. Water fluoridation for the prevention of dental caries. Cochrane Database of Systematic Reviews 2015, Issue 6. Art. No.: CD010856. DOI: 10.1002/14651858.CD010856.pub2. Accesse d 17 April 2022.

Current studies fail to report significant benefit. such as Maupome⁴⁷ McLaren⁴⁸ Slade⁴⁹ Meyer⁵⁰ Do⁵¹ Chankanka⁵²,⁵³ Choo-Wosoba⁵⁴. The CDC also states, "Ingestion of fluoride is not likely to reduce tooth decay."⁵⁵ The apparent benefit⁵⁶ of fluoride is the precipitation of the less soluble mineral phase of fluorapatite in the tooth structure, a topical action.

⁴⁷Maupomé G, Clark DC, Levy SM, Berkowitz J. Patterns of dental caries following the cessation of water fluoridation. Community Dent Oral Epidemiol. 2001 Feb;29(1):37-47. PMID: 11153562.

⁴⁸McLaren L, Singhal S. Does cessation of community water fluoridation lead to an increase in tooth decay? A systematic review of published studies. J Epidemiol Community Health. 2016 Sep;70(9):934-40. doi: 10.1136/jech-2015-206502. Epub 2016 May 13. PMID: 27177581; PMCID: PMC5013153.

⁴⁹Slade GD, Grider WB, Maas WR, Sanders AE. Water Fluoridation and Dental Caries in U.S. Children and Adolescents. J Dent Res. 2018 Sep;97(10):1122-1128. doi: 10.1177/0022034518774331. Epub 2018 Jun 14. PMID: 29900806; PMCID: PMC6169031.

⁵⁰Meyer J, Margaritis V, Mendelsohn A. Consequences of community water fluoridation cessation for Medicaid-eligible children and adolescents in Juneau, Alaska. BMC Oral Health. 2018 Dec 13;18(1):215. doi: 10.1186/s12903-018-0684-2. PMID: 30545358; PMCID: PMC6293551.

⁵¹Do L, Ha D, Peres MA, Skinner J, Byun R, Spencer AJ. Effectiveness of water fluoridation in the prevention of dental caries across adult age groups. Community Dent Oral Epidemiol. 2017 Jun;45(3):225-232. doi: 10.1111/cdoe.12280. Epub 2017 Jan 16. PMID: 28092105.

⁵²Chankanka O, Marshall TA, Levy SM, Cavanaugh JE, Warren JJ, Broffitt B, Kolker JL. Mixed dentition cavitated caries incidence and dietary intake frequencies. Pediatr Dent. 2011 May-Jun;33(3):233-40. PMID: 21703076; PM-CID: PMC3690298.

⁵³Chankanka O, Levy SM, Marshall TA, Cavanaugh JE, Warren JJ, Broffitt B, Kolker JL. The associations between dietary intakes from 36 to 60 months of age and primary dentition non-cavitated caries and cavitated caries. J Public Health Dent. 2015 Fall;75(4):265-73. doi: 10.1111/j.1752-7325.2012.00376.x. Epub

⁵⁴Choo-Wosoba H, Gaskins J, Levy S, Datta S. A Bayesian approach for analyzing zero-inflated clustered count data with dispersion. Stat Med. 2018 Feb 28;37(5):801-812. doi: 10.1002/sim.7541. Epub 2017 Nov 6. PMID: 29108124; PMCID: PMC5799048.

⁵⁵Achievements in Public Health, 1900-1999: Fluoridation of Drinking Water to Prevent Dental Caries. MMWR, 48(41); 933-940, October 22, 1999

⁵⁶Limeback H, A re-examination of the pre-eruptive and post-eruptive mechanism of the anti-caries effects of fluoride: is there any anti-caries benefit from swallowing fluoride? Community Dentistry and Oral Epidemiology, First Published 14 February 2007 https://doi.org/10.1111/j.1600-0528.1999.tb01993.x Volume27, Issue1 February 1999 Pages 62-71

V. RISKS: COST OF DENTAL FLUOROSIS (See also Endnote References)

"estimated costs for restoring function exceeds the cosmetic costs"

WHO reports, "In acute poisoning, fluoride kills by blocking normal cellular metabolism. Fluoride inhibits enzymes, in particular metalloenzymes involved in essential processes, causing vital functions such as the initiation and transmission of nerve impulses, to cease. Interference with necessary bodily functions controlled by calcium may be even more important." Assuming fluoride has a threshold for everyone which is safe is presumptive.

Researchers have indicated water fluoridation is a crude and rather ineffective policy to prevent dental caries without a detectable threshold for dental damage. (Dong and European Commission, 2011) A detectible threshold of fluoride exposure for dental damage is possible and critical for the policy of fluoridation. Although the odds of developing dental fluorosis increased with increased water fluoride concentration, the potential for harm exists at all water fluoride concentrations and unique for different individuals.

Gu⁵⁸ (2020" "The pathogenesis of dental fluorosis is not totally clear, which may be a complex pathological process involving both genetic and environmental factors. The prevalence of dental fluorosis has an upward trend around the world, thus certain public prevention and treatment strategies need to be taken."

Jarquín-Yñezá⁵⁹ (2018) "Conclusions: An association of rs 412777 polymorphism in the COL1A2 gene with dental fluorosis was found. Therefore, genetic variants represent a relevant risk factor to develop dental fluorosis, as it was proven in this study conducted in Mexican children."

⁵⁷ Environmental Health Criteria 36, Fluorine and Fluorides, p. 52, 1984

⁵⁸ Gu LS, Wei X, Ling JQ. [Etiology, diagnosis, prevention and treatment of dental fluorosis]. Zhonghua Kou Qiang Yi Xue Za Zhi. 2020 May 9;55(5):296-301. Chinese. doi: 10.3760/cma.j.cn112144-20200317-00156. PMID: 32392970

⁵⁹ Jarquín-Yñezá L, Alegría-Torres JA, Castillo CG, de Jesús Mejía-Saavedra J. Dental fluorosis and a polymorphism in the COL1A2 gene in Mexican children. Arch Oral Biol. 2018 Dec;96:21-25. doi: 10.1016/j.archoralbio.2018.08.010. Epub 2018 Aug 23. PMID: 30172079.

Suzuki⁶⁰ (2015) We demonstrate that fluoride exposure generates reactive oxygen species (ROS) and the resulting oxidative damage is counteracted by SIRT1/autophagy induction through c-Jun N-terminal kinase (JNK) signaling in ameloblasts. In the mouse-ameloblast-derived cell line LS8, fluoride induced ROS, mitochondrial damage including cytochrome-c release, up-regulation of UCP2, attenuation of ATP synthesis, and H2AX phosphorylation (γ H2AX), which is a marker of DNA damage."

Dental fluorosis is usually considered the singular causation, a biomarker, of excess fluoride ingestion prior to 6-8 years of age; however, other unknowns need to be explored⁶¹ to explain the significant increase in dental fluorosis.

DENTAL FLUOROSIS IS BOTH COSMETIC AND FUNCTIONAL

Collins. 62 (1987) "A mean cost for all consultants shows that the estimated costs for restoring function exceeds the cosmetic costs in all categories except the minimum later costs. This represents a new finding and raises an issue that has been overlooked or ignored by previous investigators and the profession. i.e... that repair of the cosmetic discoloration was the only cost involved; or that repair of dysfunction was never considered to be a problem." (Emphasis supplied)

Collins study was funded by the EPA for the EPA and peer reviewed by the EPA to evaluate the cost of fluoride exposure from water at four concentrations. The six consultants do not appear to be blinded, they were chosen from locations with various fluoride concentrations. and do not appear to have been cosmetic dentists. Perhaps the consultants were functional dentists rather than cosmetic dentists and their focus was on functional restorations. Regardless, dental fluorosis is both cosmetic and functional damage.

⁶⁰ Suzuki M, Bandoski C, Bartlett JD. Fluoride induces oxidative damage and SIRT1/autophagy through ROS-mediated JNK signaling. Free Radic Biol Med. 2015 Dec;89:369-78. doi: 10.1016/j.freeradbiomed.2015.08.015. Epub 2015 Sep 30. PMID: 26431905; PMCID: PMC4684823.

⁶¹ Akpata ES. Occurrence and management of dental fluorosis. Int Dent J. 2001 Oct;51(5):325-33. doi: 10.1002/j.1875-595x.2001.tb00845.x. PMID: 11697585.

⁶²Collins, E., V. Segreto, H. Martin, AND H. Dickson. ANALYSIS OF COSTS FOR THE TREATMENT OF DENTAL FLUOROSIS. U.S. Environmental Protection Agency, Washington, D.C., EPA/600/5-87/001 (NTIS PB87170817), 1987.

"Damage is the cost, not the repair." Without patient consent, compensation for damage with quality treatment costs is reasonable. Harm from fluoridation is not self inflicted harm or patient negligence.

The picture of severe fluorosis to the right is of my patient growing up on fluoridated bottled "Nursery Water" (DS Waters of America Inc. <1 ppm) starting at age 4 months. Mom is confident he did not use fluoride toothpaste until



about age 4 years old and did not swallow toothpaste. Estimated exposure is less than 1 mg per day when young to about 1 mg at age 4. Dosage estimated at 0.13+ mg/kg/day when 4 months old to 0.05+ mg/kg/day at 4 years. An increase in fluoride exposure when fluoridated toothpaste started would be expected. This severe dental fluorosis damage is known harm from excess fluoride primarily from water below fluoridation concentrations recommended by WHO.

The Nuffield Council suggests the risks for a public health policy should be judged on "**potential harm**," more protective than "possible, presumed, or known harm."

WHO accepts the known harm calling it an "adverse effect," yet, minimizes the harm. "However, fluoride can also have an adverse effect on tooth enamel and may give rise to mild dental fluorosis (prevalence: 12–33%) at drinking-water concentrations between 0.9 and 1.2 mg/l, depending on drinking-water intake and exposure to fluoride from other sources."

WHO falls into the trap of protecting fluoridation by attempting to isolate the exposure of fluoride from total fluoride exposure. Real world life is not lived in isolation and Public Health must NOT ignore total fluoride exposure from all sources and patient sensitivities.

Akpata⁶³ reports, *In some countries, exposure to apparently low fluoride concentrations in drinking water has resulted in severe dental fluorosis in some children.*

⁶³ Akpata ES. Occurrence and management of dental fluorosis. Int Dent J. 2001 Oct;51(5):325-33. doi: 10.1002/j.1875-595x.2001.tb00845.x. PMID: 11697585.

In contrast, the US Centers for Disease Control and Prevention (CDC)⁶⁴ and Community Preventive Task Force⁶⁵ report no harm from fluoridation except dental fluorosis and only cosmetic, usually only noticed by trained professionals, and other sources of fluoride are not significant.

PERCENTAGE OF THE POPULATION HARMED WITH DENTAL FLUOROSIS

Cosmetic dentistry is subjective and dependent on the dentists opinion, presentation of cosmetic health, their skill, training, materials available, socioeconomics of their patient base and each individual patient's subjective opinion.

In 1993, Riordan⁶⁶ reported 17.5% of 7 year olds who do not have all their adult teeth were assessed by members of the public as a notable concern of dental fluorosis. Functional damage was not included. With dental fluorosis about twice as high now as 1993, and currently NHANES twice reporting 70% of children with dental fluorosis, a conservative estimation of 17.5% of children have **notable concern and functional damage** is reasonable which would include a percentage of those with mild dental fluorosis and most with moderate and severe fluorosis.

Moderate and severe fluorosis appears to range from 3.6% (Beltran-Aguilar ages 12-15 years in 1999-2004) 6% (Ko) to 28% (NHANES 2012).

An estimated range of 4% to 17.5% of those fluoridated have cosmetic concern and/or functional damage contributed by fluoridation.

DENTAL FLUOROSIS TREATMENT OPTIONS

Treatment options today are potentially different than in the 1980's Collins' study which reported a range between \$660 to \$12,000 (2019 dollars corrected by 2.2 for inflation). Collins made an assumption a needed treatment would last a lifetime. Because more functional damage was noted in Collins study than cosmetic damage, the possibility the consultants put a higher treatment

⁶⁴ https://www.cdc.gov/fluoridation/faqs/community-water-fluoridation.html accessed May 17, 2022

⁶⁵ Community Preventive Services Task Force; https://www.thecommunityguide.org/sites/default/files/assets/Oral-Health-Caries-Community-Water-Fluoridation.pdf 2015 Accessed May 17, 2022

⁶⁶Riordan PJ. Perceptions of Dental Fluorosis. *Journal of Dental Research*. 1993;72(9):1268-1274. doi:10.1177/00220345930720090201

priority on functional harm than cosmetic harm must be considered. Damage is measured here by the cost of quality treatment rather than dental insurance covered procedures.

While practicing in a low socioeconomic community, I almost never treated cosmetic issues. Moving to a high socioeconomic community I frequently treat cosmetic concerns. When people have money, cosmetics becomes a greater concern and dentists tend to diagnose what their patients can afford or is covered by their insurance. There is no wonder why Delta Dental funds fluoridation when they assume benefit and do not cover cosmetic damage.



Micro-abrasion,⁶⁷ grinding away the outer layer of enamel, can improve superficial defects of dental fluorosis. Treatment estimated \$500 to \$2,500 per patient life time and may need additional vital bleaching. Some patients consider micro-abrasion additional damage, but certainly less than a typical crown or veneer.

Bleaching is more acceptable to some but tends to whiten all areas and a contrast in shade is, for some, not fully restored. Bleaching needs to be retreated and an estimate is \$100 to \$600 every 2 years. We use an estimated \$100 PPPY (per person per year) for 60 years, \$6,000 life time

⁶⁷ Azzahim L, Chala S, Abdallaoui F. La micro-abrasion amélaire associée à l'éclaircissement externe: intérêt dans la prise en charge de la fluorose [Role of enamel microabrasion associated with external bleaching in the management of patients with dental fluorosis]. Pan Afr Med J. 2019 Oct 4;34:72. French. doi: 10.11604/pamj.2019.34.72.20401. PMID: 31819788; PMCID: PMC6884726.

treatment costs. Statista survey⁶⁸ reports 37 million in the USA had bleaching in 2020, about 14% of the age range of dental fluorosis.

Placing a value on the damage for patient perceived damage, assumed to be mostly in moderate to severe fluorosis found objectionable with high quality cosmetic and functional treatment is estimated at \$1,000 to \$2,500 per tooth, \$1,200 is used here. The diagnosis of dental fluorosis is based on the two worst teeth, although 1 to 28 teeth can be damaged. If costs are not the controlling factor, a cosmetic patient will want several or all upper and lower teeth treated. An estimate of an average of 10 teeth at \$1,200 per tooth damage both functional and cosmetic is at the high end of Collins EPA study and in keeping with high quality cosmetic restorative treatment. For a lifetime cost, the work is estimated to be replaced an average of every 12 years, or \$1,000 PPPY, 60 year lifetime of \$60,000 damage. Damage is determined by cost of damage.

Assuming 4% to 17.5%% of the population have fluorosis of noticeable and functional harm which they would choose to be compensated for (\$2,400-\$10,500), and 1.46% at each year of life, an average per capita harm to teeth from excess fluoride exposure is \$35 to \$153 PPPY harm to teeth compared to \$6 PPPY benefit to teeth.

From just an evaluation of dental benefit cost analysis, fluoridation does not make sense.

An example of high quality dental fluorosis treatment (not my patient):

⁶⁸ https://www.statista.com/statistics/287384/usage-of-tooth-whiteners-in-the-us-trend/

VI. COST OF FLUOROSIS DAMAGE (See also Endnote References)

"The principle hazard at issue from exposure to fluoridation chemicals is IQ loss.69"

Several streams of evidence should be kept in mind. Fluoride concentrations in water are not individual total exposure because not everyone drinks the same amount of water, some drink 10 times more than the mean, and some ingest more from other sources such as swallowing tooth-paste. Genetic factors need inclusion. An uncertainty factor should be included and a range of total exposure of at least 10 should be used. Pregnant moms are of particular concern because the placenta does not significantly protect the developing fetus from fluoride.

Whereas the mechanism for potential benefit from swallowing fluoride is not well understood, the mechanism of fluoride's developmental neurotoxicity has been reported. "NaF induces developmental neurotoxicity by decreasing lysosomal V-ATPase expression, increasing lysosomal pH, disrupting lysosomal degradation capacity, and blocking autophagic flux, induced neurotoxicity."⁷⁰

Over 70 human IQ studies have reported developmental neurotoxicity from fluoride. Most studies prior to 2015 were ecological in design as opposed to individual level exposure and most not reasonably applicable to fluoridation concentrations. Since 2015, high-quality USA government funded studies included measurements at the individual level, at fluoridation concentrations 0.7 mg/L fluoride or less and report harm.

Twenty seven of the IQ studies published between 1988-2012 were used in a meta-analysis by a Harvard University team including Philippe Grandjean (Choi et al 2012). The consistent results from several countries found lower IQ in the "high-fluoride" villages compared with the low-fluoride villages, averaging 7 IQ points lower. Most were at levels above 0.7 mg/l.

⁶⁹Bruce Lamphear MD MPH Professor of Health Sciences at Simon Fraser University. Authored the seminal research on the neurotoxicity of lead.

⁷⁰Han X, Tang Y, Zhang J, Hu Z, Xu W, Xu S, Niu Q, Impaired V-ATPase leads to increased lysosomal pH, results in disrupted lysosomal degradation and autophagic flux blockage, contributes to fluoride-induced developmental neurotoxicity, Ecotoxicology and Environmental Safety, Accepted 6 April 2022 www.elsevier.com/lo-cate/ecoenv https://doi.org/10.1016/j.ecoenv.2022.113500

Some may suggest the findings are irrelevant to fluoridation programs at 0.7 mg/L; however, potential harm to some or many should consider: (a.) the individual amount of water ingested, (b) total fluoride exposure, (c) patient sensitivity, (d) nutritional status (e) other toxicants such as arsenic, (f) and lack of uncertainty factor.

The NTP's systematic review of fluoride's neurotoxicity (2016-2022).

The US National Toxicology Program (NTP) Draft Monograph on the Systematic Review of Fluoride Exposure and Neurodevelopmental and Cognitive Health Effects⁷¹ concludes fluoride is presumed to have a developmental neurotoxic effect on the developing brain, resulting in lower IQ. "Presumed" determination is stronger confidence than Nuffield's "potential harm." "Fluoride is presumed to be a cognitive neurodevelopmental hazard to humans is based on consistent evidence from 26 lower risk-of-bias studies that evaluated fluoride exposure and effects on children's IQ and other cognitive effects."⁷²

The National Academy of Science (NAS) did a peer review of the NTP draft but "did not conduct its own independent evaluation of the evidence, and it did not conduct a data audit," nor was the review blinded. The NAS did not refute the conclusion, in part because the NTP did not conduct a formal dose-response assessment. NTP did not evaluate benefit, only developmental neurotoxicity.

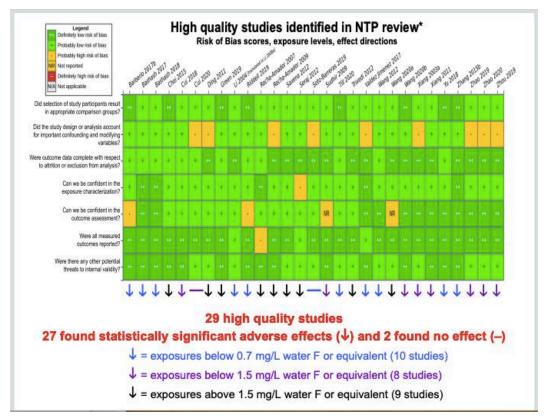
The NAS draft concluded, "the committee does not find that NTP has adequately supported its conclusion. That finding does not mean that the conclusion is incorrect; rather, further analysis or reanalysis as noted in the present report is needed to support conclusions in the monograph."

The NTP has published two drafts of its review of fluoride's neurotoxicity, (NTP,2019, NTP,2020).

The draft versions have indicated that of 29 High Quality (i.e. low risk of bias), 27 found a lowering of IQ and only 2 found no effect. Of these 27, 10 were conducted at 0.7 ppm or lower; another 8 conducted between 0.7 and 1.5 ppm and 9 at 1.5 ppm or higher (ISEE-2020 poster).

⁷¹https://www.asdwa.org/wp-content/uploads/2019/10/draft fluoride monograph 20190906 5081.pdf

⁷²DRAFT NTP MONOGRAPH ON THE SYSTEMATIC REVIEW OF FLUORIDE EXPOSURE AND NEURODEVELOPMENTAL AND COGNITIVE HEALTH EFFECTS p. 72. https://fluoridealert.org/wp-content/uploads/ntp.revised-monograph.9-16-2020.pdf



The top of the half of this figure is the NTP's summary of the quality (risk of bias) ratings given by the NTP for 29 studies. The color code ranges from green to red, where green represents low risk of bias (i.e. high-quality) and red means high risk of bias (i.e. low-quality). The lower part of the figure has been added by Chris Neurath, FAN's research director, who has identified the water fluoridation measured in each study (see ISEE-2020 poster).

The finding of lowering IQ at 1.5 ppm offers no adequate margin of safety when you are exposing a large population of children to 0.7 ppm of fluoride in their drinking water. There are two reasons for this a) children drink different amounts of water and b) there is a wide range of sensitivity to any toxic substance among a large population. Typically, regulatory agencies like the EPA would like a margin of safety of 10, in this case 1.5 ppm only offers a margin of safety of 2.

Three benchmark dose analysis have been done for fluoride's developmental neurotoxicity, with consistent results.

Hirzy (2016) reported 1 IQ loss at 0.22 mg/L fluoride in water.

Grandjean (2021)⁷³ 1 IQ loss at 0.2 mg/L fluoride in urine or water. "Thus, the joint data show a BMCL in terms of the adjusted U-F (urine fluoride) concentrations in the pregnant women of approximately 0.2 mg/L. These results can be used to guide decisions on preventing excess fluoride exposure in pregnant women."

The third by Thiessen⁷⁴ for the TSCA ongoing trial against the EPA.

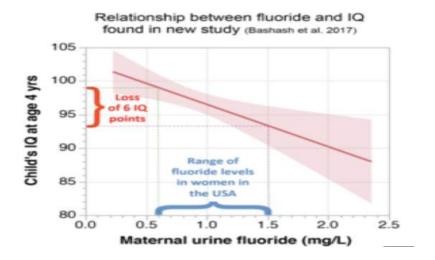
Table 6 of the NTP 2020 draft report lists only three studies from the year 2020, Wang, Cui, and Till, no studies from 2021 or 2022. The potential that additional studies will contradict the combined strength of current studies reporting harm is highly unlikely.

Three studies to consider based on individual measurements of fluoride exposure (<u>Bashash et al.</u>, <u>2017</u>) published in *Environmental Health Perspectives*, then <u>Green et al.</u>, <u>2019</u> published in JAMA Pediatrics and <u>Till et al.</u>, <u>2020</u>) in *Environment International*. They controlled for confounding variables and were conducted either in fluoridated communities at 0.7 ppm (Green, 2019 and Till, 2020) or in communities with exposures (from other sources) in the same range as fluoridated communities (Bashash, 2017 and 2018).

Bashash, et al. 2017, a 12-year, prospective mother-child cohort study reported a 4 to 5 point loss of IQ in offspring, associated with maternal fluoride intake, typical of a fluoridated community. The mother's fluoride exposure was measured directly via urinary fluoride level and the paired offspring's IQ was measured (again individually) at 4 and 6-12 years of age. Measured urinary fluoride concentration evaluates total fluoride exposure regardless of the source. Graphing the Bashash 2017 data below.

⁷³Grandjean P, Hu H, Till C, Green R, Bashash M, Flora D, Tellez-Rojo MM, Song PXK, Lanphear B, Budtz-Jørgensen E. A Benchmark Dose Analysis for Maternal Pregnancy Urine-Fluoride and IQ in Children. Risk Anal. 2021 Jun 8. doi: 10.1111/risa.13767. Epub ahead of print. PMID: 34101876.

⁷⁴Kathleen Thiessen Ph.D Director and senior scientist at Oak Ridge Center for Risk Analysis. Served on the 2006 National Research Council panel that reviewed the toxicologic literature on fluoride.



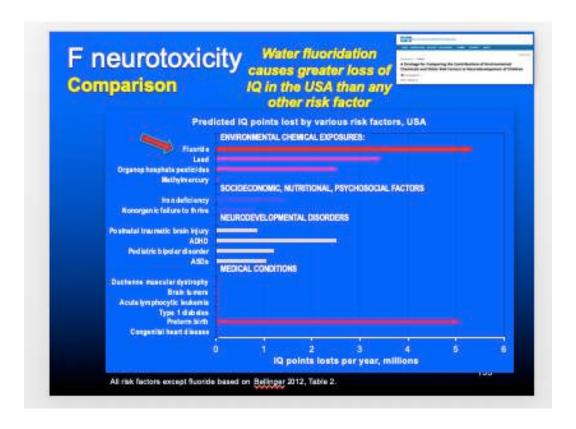
(Graph by Connett and Neurath)

Till et al, 2018. again measured the urine fluoride levels in pregnant women across Canada and reported the urine fluoride levels were twice as high in fluoridated communities as in non-fluoridated communities. Till et al reported the average levels in the fluoridated communities were similar to the levels found by Bashash, i.e. 0.91 versus 0.87 ppm.

Green et al., 2019 published in *JAMA Pediatrics* essentially replicated the Bashash, 2017 findings IQ lower in boys associated with maternal fluoride exposure but not in girls. Using two other ways of assessing maternal fluoride exposure they reported IQ low for boys and girls.

A podcast (LINK) by two of the *JAMA Pediatrics* editors is short and well worth watching. The editors also published in the same issue of the journal an editorial explaining this and an article from Dr. David Bellinger.

Till et al., 2020. showed that early infancy is another vulnerable period from fluoride for the developing brain. Till found a large significant lowering of IQ (i.e. up to 9 IQ points) for children who were bottle-fed in *fluoridated communities* in Canada (F level = 0.7 ppm or less) compared to those who were bottle-fed in *non-fluoridated communities*.



This figure is based on data collected by David Bellinger (<u>Bellinger, 2012</u>, Table 2) only the fluoride data line has been added. Figure by Chris Neurath (<u>ISEE-2020</u> poster)

Gram for gram, based on our current understanding, fluoride is not more neurotoxic than lead. Lead levels and IQ loss is measured in parts per *billion* fluoride and IQ loss is measured in parts per *million*. However, millions of people every day in the USA is leading to a greater overall loss of IQ points at the population level.

Studies reporting no IQ concerns.

Broadbent et al. (2015) The draft versions of the systematic review by the NTP gave this study a low-quality rating (a high risk of bias). Osmunson⁷⁵ reported the study had little power to find a difference in IQ between the children who drank fluoridated water and those who didn't. There were nearly 1000 children who grew up in a fluoridated area but less than 100 who did not. Only fluoride via water was measured and not via tea, toothpaste or via supplements which are seldom prescribed to those on fluoridated water; therefore, most supplements would have been pre-

⁷⁵Osmunson, B., Limeback, H., & Neurath, C. (2016). Study Incapable Of Detecting IQ Loss From Fluoride. *American journal of public health*, *106*(2), 212–213. https://doi.org/10.2105/AJPH.2015.302918

scribed in the non fluoridated 100 children. Exposure during fetal and infant development were not measured.

Aggeborn and Öhman (2016). The Effects of Fluoride In The Drinking Water. looked at populations by region in Sweden and used the average naturally occurring fluoride level because Sweden is not artificially fluoridated. The authors considered population measurements for cognitive ability and achievement. Individual measurements of fluoride exposure were not made. Dr. Vyvyan Howard, an infant and fetal pathologist, "Anybody who accepts that this paper trumps Bashash and/or Green can't have read any of the studies very thoroughly - or has an agenda."

Guth et al. 2020 and 2021 incorrectly give more weight to the Broadbent study than to the Green study with individual measured fluoride concentrations.

Miranda et al., 2021 only considered studies of children aged 8-12. (See https://www.qeios.-com/read/X3MKH8).

<u>Ibarluzea et al., 2022</u>. This prospective cohort study from Spain is an outlier. They did *not* find a loss of IQ in the fluoridated community compared to the non-fluoridated community, rather they found a *15 IQ point benefit* for boys. Ibarluzea et al appears to have failed to adequately control for other toxins such as for lead and arsenic in the industrial non-fluoridated community.

TOXIC SUBSTANCE CONTROL ACT LEGAL ACTION

In 2017, the EPA was taken to Federal court (Region 9, San Francisco). Experts for the plaintiffs were Howard Hu (director of the ELEMENT cohort in Mexico City which was used in the Bashash, 2017 and 2018 studies); Bruce Lanphear, a world-renowned expert on lead's neurotoxicity and co-author of the Green, 2019 and Till, 2021 studies and Philippe Grandjean, a world-renowned expert on mercury's neurotoxicity and author of <u>a risk assessment (BMD analysis)</u> on fluoride's neurotoxicity.

EPA used Exponent, Inc. experts. The EPA lawyers chose not to use scientists from within the agency, but instead used experts from the firm *Exponent, Inc.* This firm is well known for being highly industry-friendly defending the safety of such chemicals as dioxins, PCBs, PFOS and Monsanto's glyphosate. The Exponent's experts agreed the four US government-funded studies (Bashash, 2017, 2018; Green, 2019 and Till, 2020) are the highest quality human studies on fluoride conducted to date.

Hu, "Fluoride is a developmental neurotoxicant at levels of exposure seen in the general population in water-fluoridated communities."

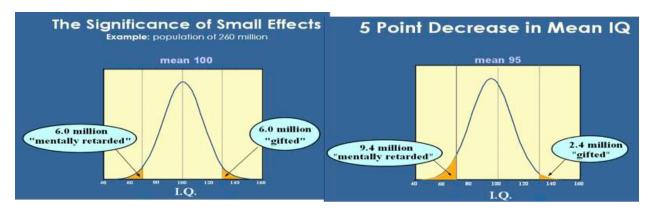
Grandjean⁷⁶ "IQ losses associated with community water fluoridation are substantial and of significant public health concern."

Lamphear⁷⁷ "Fluoride exposure during early brain development diminishes the intellectual abilities in young children."

Estimating the cost of lower IQ depends in part on what is included in lower IQ. Research indicates we can expect more than 50% increase in special education students, half as many gifted, increase in incarceration, increase in divorce, increase in job loss and less job retention. Higher IQ is also associated with increased happiness.

For more human studies reporting fluoride's developmental neurotoxicity, see https://fluorideal-ert.org/studies/brain01/ where a review of studies which do not report an association between fluoride and IQ can be found.

Graphing the effect of 5 IQ loss on the population below raises serious concern.



(Illustration used by Physicians for Social Responsibility and effects of lead)

⁷⁶Phillipe Grandjean MD DMSc Chair of Environmental Medicine at the University of Southern Denmark. Nearly 500 papers published, specialized in developmental exposures to environmental chemicals like mercury, fluoride, and lead.

⁷⁷Bruce Lamphear MD MPH Professor of Health Sciences at Simon Fraser University.

In addition, blood lead levels in fluoridated communities are twice as high for whites and six times higher for African Americans.⁷⁸, ⁷⁹, ⁸⁰

There is an incredible correlation between IQ and income. Various reports find homeless mean IQ of 80, average American welfare recipient IQ 92, millionaires IQ 118 and billionaires 130.81 However there is not a direct correlation between dollars and IQ. For example, some professions such as University Professors, Judges, and Humanitarian agency employees often have very high IQ but chose the betterment of society rather their own financial benefit.

We are just beginning to determine what dimension of IQ is harmed the most with fluoride ingestion. "According to professor Howard Gardner of Harvard University, intelligence can be measured along seven different dimensions: Visual-spatial, bodily-kinesthetic, musical, social, emotional, linguistic, and logical-mathematical. At most, an IQ test tries to measure three of these: Visual-spatial, linguistic, and logical-mathematical. Some people see even more dimensions — creativity, memory and retention, reaction time, etc."

As scientists test fluoride's neurotoxic effects in more specific ages, races, genders, nutrients, diseases, medications, and various intelligence dimensions, we will have a more clear and elevated confidence on precisely how much and what aspects of the human brain and nervous system is being harmed.

There will always be some who in effect require RCTs of harm to prove damage. However, an ethical approach only requires our confidence to be at a potential of harm.

⁷⁸Coplan MJ, Patch SC, Masters RD, Bachman MS. Confirmation of and explanations for elevated blood lead and other disorders in children exposed to water disinfection and fluoridation chemicals. Neurotoxicology. 2007 Sep;28(5):1032-42. doi: 10.1016/j.neuro.2007.02.012. Epub 2007 Mar 1. PMID: 17420053.

⁷⁹Maas RP, Patch SC, Christian AM, Coplan MJ. Effects of fluoridation and disinfection agent combinations on lead leaching from leaded-brass parts. Neurotoxicology. 2007 Sep;28(5):1023-31. doi: 10.1016/j.neuro.2007.06.006. Epub 2007 Jun 30. PMID: 17697714.

⁸⁰Masters RD, Coplan MJ, Hone BT, Dykes JE. Association of silicofluoride treated water with elevated blood lead. Neurotoxicology. 2000 Dec;21(6):1091-100. PMID: 11233755.

⁸¹ https://pumpkinperson.com/2016/02/11/the-incredible-correlation-between-iq-income/

Muir⁸² (2001) estimated 5 IQ loss in the USA of \$275 and \$326 Billion per year or \$980 to \$1,160 PPPY in 2001 and correcting 2.2 for 2010 dollars is \$2,156 to \$2,552PPPY

The highest estimate of fluoridation's benefit is lost when including cosmetic and functional harm and presumed developmental neurotoxic effects are more confident than a judgment of potential harm.

Attempting to measure harm to the brain with money, fails to include the emotional harm and grief for the patient, their families and friends.

⁸²Muir T, Zegarac M., Societal Costs of Exposure to Toxic Substances: Economic and Health Costs of Four Case Studies That Are Candidates for Environmental Causation. Environmental Health Perspectives Volume 109 Supplement 6. December 2001.

VII. RISK: POTENTIAL ADHD INCREASE.

Attention Deficit Hyperactivity Disorder (ADHD) has become one of the most commonly diagnosed childhood behavioral disorders. Its basic characteristics are inattention, hyperactivity and impulsivity. "ADHD often continues into adolescence and adulthood, which can lead to medication dependency and a lifetime of treatment (Maddox et al.YEAR)"

Malin and Till examined the relationship between exposure to fluoridated water and ADHD prevalence among children and adolescents, ages 4-17, in the United States. The authors found that, the percentage of each state fluoridated as assessed in 1992, "significantly positively predicted state prevalence of ADHD in 2003, 2007 and 2011, even after controlling for socioeconomic status."

A multivariate regression analysis showed that after socioeconomic status was controlled each 1% increase in artificial fluoridation prevalence in 1992 was associated with approximately 67,000 to 131,000 additional ADHD diagnoses from 2003 to 2011. Overall state water fluoridation prevalence (not distinguishing between fluoridation types) was also significantly positively correlated with state prevalence of ADHD for all but one year examined." (Malin & Till, 2015). See figure below

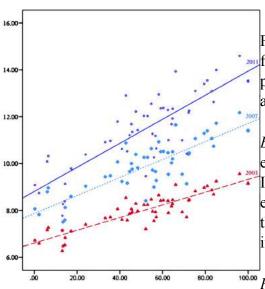


Figure 12: Percent of children with ADHD (by state) for 2003, 2007 and 2011 plotted against the % of the population in each state fluoridated in 1992 (Mallin and Till, 2015)

Bashash et al., 2018 using the same ELEMENT mother-child cohort in Mexico City that they used in their IQ study (Bashash et al, 2017) found that as the mothers' exposure to fluoride increased (as measured in their urine) so did the number of symptoms of ADHD increase in their offspring

Riddell, et al. 2019. Reported 284% increase in the prevalence of ADHD among adolescents in fluoridated

communities in Canada compared to non-fluoridated communities.

ADHD appears to have different phases and life long effect.83

⁸³Brod, M., Schmitt, E., Goodwin, M. et al. ADHD burden of illness in older adults: a life course perspective. Qual Life Res **21**, 795–799 (2012). https://doi.org/10.1007/s11136-011-9981-9

CDC⁸⁴ 2016 reported National Prevalence of ADHD at 6.1% children 2-17. That reduces 4.5% of the total population are on fluoridated water. We estimate half or 2.25% of the ADHD is from fluoridation.

Miller⁸⁵ estimated excess ADHD costs from \$143 to \$266 Billion per year, we use 2.25% of 180 Billion resulting in \$4 Billion per year, 60 year lifespan, for \$240 Billion ADHD lifetime harm from fluoridation. For every dollar saved with fluoridation, ADHD costs increase by \$1,700. However, some of these costs would overlap with costs for lower IQ.

⁸⁴Danielson M, Bitsko R, Ghandour RM, Holbrook J, Kogan,M, Prevalence of Parent-Reported ADHD Diagnosis and Associated Treatment among U.S. Children and Adolescents, 2016.. Journal of Clinical Child and Adolescent Psychology. Published online before print January 24, 2018

⁸⁵Miller C, Study Finds Substantial Economic Impact of ADHD in the United States. American Psychiatric Association Foundation, November 2016.

VIII. RISK: ENDOCRINE AND HORMONE DISRUPTION (See also endnotes)

"Endocrine systems, also referred to as hormone systems, are found in all mammals, birds, fish, and many other types of living organisms. They are made up of:

- -Glands located throughout the body;
- -Hormones that are made by the glands and released into the bloodstream or the fluid surrounding cells; and
- -Receptors in various organs and tissues that recognize and respond to the hormones."86, 87

Hormones regulate many biological processes and regulate blood sugar, growth, , reproductive organs, metabolism, sex hormones, development of the brain, and nervous system, testes, ovaries, pituitary, thyroid and adrenal glands.

The National Research Council (NRC, 2006) panel devoted a whole chapter to a discussion of fluoride and the endocrine system.

The panel concluded that fluoride was an <u>endocrine disruptor</u>. The authors state:

"The chief endocrine effects of fluoride exposures in experimental animals and in humans include decreased thyroid function, increased calcitonin activity, increased parathyroid hormone activity, secondary hyperparathyroidism, impaired glucose intolerance, and possible effects on the timing of sexual maturity. Some of these effects are associated with fluoride intake that is achievable at fluoride concentrations in drinking water of 4 mg/L or less, especially for young children or for individuals with high water intake. (p. 8, NRC 2006)

"In summary, evidence of several types indicates that fluoride affects normal endocrine function or response; the effects of the fluoride-induced changes vary in degree and kind in different individuals. Fluoride is therefore an endocrine disruptor in the broad sense of altering normal endocrine function or response, although probably not in the sense of mimicking a normal hormone." (p. 266, NRC 2006)

⁸⁶https://www.epa.gov/endocrine-disruption/what-endocrine-system#hormones

⁸⁷United States Environmental Protection Agency, What is the Endocrine System? https://www.epa.gov/endocrine-disruption/what-endocrine-system#hormones

Endocrine damage is a serious concern. Endocrine disruption can cause developmental malformations, reproductive harm, increased cancer risk, disturbances in the immune and nervous system function.

Cost of Endocrine disruption from fluoride. Attina⁸⁸ (2016) estimated the economic burden due to the health effects of endocrine-disrupting chemicals at \$340 Billion which maybe low. Estimating how much damage is caused by each specific endocrine disrupting chemical has not been published. The amount of damage from fluoride exposure is not know and probably overlap with lower IQ and ADHD.

Liang⁸⁹ "These results revealed that fluoride could induce mitochondrial impairment and excessive PINK1/Parkin-mediated mitophagy in testicular cells, especially in Leydig cells, which could contribute to the elucidation of the mechanisms of F-induced male reproductive toxicity."

Attina TM Hauser R Sathyanarayana S et al. Exposure to endocrine-disrupting chemicals in the USA: a population-based disease burden and cost analysis. Lancet Diabetes Endocrinol. 2016; 4: 996-1003

⁸⁹Liang C, Gao Y, He Y, Han Y, Manthari RK, Tikka C, Chen C, Wang J, Zhang J. Fluoride induced mitochondrial impairment and PINK1-mediated mitophagy in Leydig cells of mice: In vivo and in vitro studies. Environ Pollut. 2020 Jan;256:113438. doi: 10.1016/j.envpol.2019.113438. Epub 2019 Oct 21. PMID: 31672359.

IX. RISK: POTENTIAL FOR THYROID HARM (See also endnotes)

In 2006, the NRC panel reported: "Fluoride exposure in humans is associated with elevated TSH concentrations, increased goiter prevalence, and altered T4 and T3 concentrations; similar effects in T4 and T3 are reported in experimental animals, but TSH has not been measured in most studies." (p. 262) An elevated TSH level is an indicator of low thyroid function.

The NRC panel also indicated that effects on the thyroid have been observed at very low levels. They state that, "In humans, effects on thyroid function were associated with fluoride exposures of 0.05-0.13 mg/kg/day when iodine intake was adequate and 0.01-0.03 mg/kg/day when iodine intake was inadequate (Table 8-2)." (p. 263, NRC 2006).

Hypothyroid and fluoride study from UK. These concerns were further reinforced by new research conducted in the UK and published in 2015 by Peckham et al.⁹⁰

Peckham et al. used the records of over 98% of the General practices in England on the numbers of patients treated for hypothyroidism and examined the prevalence of this condition as a function of the fluoride levels in the local drinking water supplies. The authors noted that:

"Approximately, six million people (10%) in England live in areas where drinking water contains natural fluoride or which has been artificially fluoridated at a target concentration of 1 ppm (1 mg/L). Using prevalence data from the UK QOF, an analysis was undertaken to determine whether prevalence was affected by practice populations being situated in fluoridated areas at >0.7 mg/L and areas with lower levels of fluoride. While there are other sources of fluoride in people's diet (eg, tea), drinking water is the most significant source of ingested fluorides in the UK." (Peckham et al, 2015)

The UK research team found that higher levels of fluoride in drinking water was a useful predictor of the prevalence of hypothyroidism. They found that general medical practices located in the West Midlands (a wholly fluoridated area) are nearly twice as likely to report high hypothyroidism prevalence in comparison to Greater Manchester (non-fluoridated area). (Peckham et al, 2015)

Peckham et al, concluded:

"In many areas of the world, hypothyroidism is a major health concern and in addition to other factors—such as iodine deficiency—fluoride exposure should be considered as a contributing factor. The findings of the study raise particular concerns about the validity of community fluoridation as a safe public health measure." (Peckham et al, 2015)

⁹⁰ Peckham S, Lowery D, Spencer S. 2015. Are fluoride levels in drinking water associated with hypothyroidism prevalence in England? A large observational study of GP practice data and fluoride levels in drinking water. J Epidemiol Community Health 69(7):619-24. https://www.ncbi.nlm.nih.gov/pubmed/25714098

- A. Peckham's findings are not totally unexpected, because of the experience of doctors using fluoride to lower thyroid function in patients with hyperthyroidism. Hypothyroidism is a very common disorder in the US. In fact, one of the most prescribed drugs in the USA is synthroid, which is used to treat hypothyroidism. It can have serious adverse health effects.
- B. Race may be a factor in sensitivity to certain thyroid diseases, which may make minorities more vulnerable to fluoride's impacts on thyroid function
- C. Reduced thyroid function in pregnant women is linked to reduced IQ in their children and there is accumulating evidence that fluoride, at levels within the range to which fluoridated populations are exposed, is associated with lowered IQ (see section 14 above). Fluoride's effect on thyroid function might be one mechanism by which it lowers IQ.

Malin et al, 2018. In a large study of the Canadian population did not find an association between fluoride exposure and TSH levels (a biomarker for HYPOthyroidism) in the general population but she did find that the subset of the population which had outright or borderline iodine deficiency had their TSH levels raised further by fluoride exposure.

In other words, those who were already pre-disposed to low thyroid function (because of low iodine intake) had their condition made worse by fluoride exposure.

X. RISK: CANCER

The Nuffield Committee recommended evaluating fluoridation on the "potential" of harm.

Thiessen⁹¹ (2010) "The EPA should be aware that three U.S. courts have found fluoridated water to be carcinogenic to humans (described in detail by Graham and Morin 1999). The NRC's committee on fluoride toxicology unanimously concluded that 'Fluoride appears to have the potential to initiate or promote cancers,' even though the overall evidence is 'mixed' (NRC 2006a). . . The question becomes one of how strongly carcinogenic fluoride is, and under what circumstances."

Bassin (2006)"We observed that for males diagnosed before the age of 20 years, fluoride level in drinking water during growth was associated with an increased risk of osteosarcoma, demonstrating a peak in the odds ratios from 6 to 8 years of age. All of our models were remarkably robust in showing this effect, which coincides with the mid-childhood growth spurt." (Bassin, et al., Cancer, Causes & Control, 2006)

Osteosarcoma is a rare, but deadly, form of cancer that strikes primarily during the teenage years. A national case control study published in 2006 by Harvard scientists found that boys exposed to fluoridated water during their 6th, 7th, and 8th years of life (the mid-childhood growth spurt) had a significantly elevated risk of developing osteosarcoma during adolescence. (Bassin 2006). The sex-specific link between fluoride and osteosarcoma in young males is consistent with the government's animal study, (NTP 1990), which found osteosarcomas in the fluoride-treated male rats, but not the female ones. It is also consistent with previous studies by the National Cancer Institute and New Jersey Department of Health, which both found associations between fluoridation and osteosarcoma in young males, but not females. (Cohn 1992; NCI 1990)

The plausibility of a fluoride/osteosarcoma connection is grounded in the three considerations:

- 1. Bone is the principal site of fluoride accumulation, particularly during the growth spurts of childhood;
- 2. Fluoride is a mutagen when present at sufficient concentrations; and
- 3. Fluoride stimulates the proliferation of bone-forming cells (osteoblasts), which may "increase the risk for some of the dividing cells to become malignant." (NRC 2006).

A number of studies did not find an association between fluoride and osteosarcoma. However, they were not "age-specific" and not as carefully controlled. Douglass compared bone tumors with osteosarcoma and did not repot a significant increase in bone fluoride concentrations. However, he did not compare fluoride concentrations with age controlled healthy bone fluoride

⁹¹ KM Thiessen, Senes Oak Ridge, Inc. Center for Risk Analysis. Comments on the Need for Revision of the NPDWR for Fluoride May 27, 2010 p. 8. https://fluoridealert.org/wp-content/uploads/connett-2010.pdf

concentrations. Similar age normal bone has about 200 ppm, the tumors double and osteosarcoma triple the fluoride concentration. Comparing the osteosarcoma bone with normal bone does show a significance.

Takahashi⁹² (2001) reported, "cancers of the oral cavity and pharynx, colon and rectum, hepatobiliary and urinary organs were positively associated with FD. This was also the case for bone cancers in male, in line with results of rat experiments. Brain tumors and T-cell system Hodgkin's disease, Non-Hodgkin lymphoma, multiple myeloma, melanoma of the skin and monocytic leukaemia were also correlated with FD. Of the 36 sites, 23 were positively significant (63.9%), 9 not significant (25.0%) and 4 negatively significant (11.1%). This may indicate a complexity of mechanisms of action of fluoride in the body, especially in view of the coexising positive and negative correlations with the fluoridation index. The likelihood of fluoride acting as a genetic cause of cancer requires consideration."

⁹²Kosei Takahashi, Kenji Akiniwa, Kenichi Narita. Regression Analysis of Cancer Incidence Rates and Water Fluoride in the U.S.A. based on IACR/IARC (WHO) Data (1978-1992). Journal of Epidemiology. https://www.jstage.jst.go.jp/article/jea1991/11/4/11_4_170/_article/-char/ja/

XI. RISK: ENVIRONMENTAL JUSTICE

Other Potential Harm. (See also endnotes)

Fluoride ingested appears to go to all tissues. There are no tissues which appear safe from ingested fluoride. Only time will confirm whether fluoride harms all tissues. Some scientists have the greatest concern for the harm to the mitochondria.

A major prospective cohort study from Sweden demonstrates a higher risk of hip fractures in post-menopausal women associated with long term exposure to natural fluoride *at levels in water in the same range as America fluoridates its water* [Helte et al., 2021].

Recent epidemiological studies conducted in the United States, using individual biomarker measures of fluoride exposure, reported an association between low to moderate fluoride intake and impaired renal and hepatic function [Malin et al., 2019], increased risk of hyperuricemia [Wei et al., 2021], as well as adverse effects on reproductive endocrinology in U.S adolescents [Bai et al., 2020].

African Americans and Hispanics have been shown to be at an increased risk of developing dental fluorosis, and have a higher risk of suffering from the more severe forms of this condition (Russell, 1962; Butler et al., 1985; Williams and Zwemer, 1990; Beltrán-Aguilar et al., 2005; Martinez-Mier and Soto-Rojas, 2010).

Fluoride is more toxic when exposure is accompanied by poor nutrition, especially low iodine and calcium intake. Poor nutrition is more likely to occur in low-income families than those with higher incomes.

Lactose intolerance is more frequent among Blacks and other ethnic groups than whites. Central and East Asians are 80-100% lactose intolerant (de Vrese, 2001); Native Americans are 80-100% lactose intolerant (National Institute of Child Health and Human Development, 2006); African Americans are 75% lactose intolerant, and Southern Indians are 70% lactose intolerant (de Vrese, 2001). Less consumption of dairy products typically means lower exposure to calcium. Calcium in the diet helps to a certain extent to protect against absorption of fluoride from the gut.

African Americans consume significantly more total fluids and plain water, and thus receive more fluoride from drinking water, than white children (Sohn et al., 2009).

Minority families are less likely to breast-feed their children. As human milk contains very low levels of fluoride (Ekstrand et al., 1981, 1984; Sener et al., 2007), when baby formula is made up with fluoridated water it leads to over 100 times more exposure to fluoride than breast-feeding (see 6.5 above). African Americans are less likely to breastfeed than most other racial groups: "non-Hispanic blacks had a lower prevalence of breastfeeding initiation than non-Hispanic whites in all but two states..."-(CDC, 2010).. If the parent reduces the amount of formula to save

money as many poor parents do (Stein 2008; Egemen et al., 2002; Parraga et al., 1988), and adds more water than recommended, these children will receive even higher levels of fluoride.

Minority communities have a greater incidence of kidney disease. Poor kidney function increases fluoride's uptake into the bone, which is likely to increase the rates of arthritis and hip fractures (over a lifetime).

Minority communities have a greater incidence of diabetes, some forms of which lead to an increased consumption of water, which in turn leads to a greater consumption of fluoride.

(Sohn et al., 2009). Sener et al., 2007), African Americans are less likely to breastfeed than most other racial groups: "non-Hispanic blacks had a lower prevalence of breastfeeding initiation than non-Hispanic whites in all but two states..." (CDC, 2010).. If the parent reduces the amount of formula to save money as many poor parents do (Stein 2008; Egemen et al., 2002; Parraga et al., 1988),

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XII. ALTERNATIVES TO FLUORIDATION

If a person seriously wants to ingest fluoride, alternatives are available. The FDA has not approved fluoridation nor swallowing fluoride toothpaste. Swallowing a pea size of fluoridated toothpaste is an alternative, provides individual choice, is less expensive but still not ethically ideal. Prescriptions for supplements and topical fluoride application in schools and oral hygiene has been suggested.⁹³

However, the best alternative is oral hygiene and diet instruction along with raising the socioeconomic status of a community.

⁹³Ethics Consultation Report Ethical Considerations in Community Water Fluoridation, by the Public Health Agency of Canada's Public Health Ethics Consultative Group, December 18, 2018 p.1. https://www.caphd.ca/sites/default/files/Ethical%20Considerations%20for%20Community%20Water%20Fluoridation.pdf

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April 28, 2022

Mr. Stuart Glasoe SBOH Health Policy Advisor

Mr. Glasoe and Board Staff,

We appreciate the task you have of revising the Keeping of Animals policy and also your language mitigation in response to our members' past concerns.

We are requesting that you delay putting the CR 102 Keeping of Animals Draft Policy Proposal on the June 8^{th} agenda. There are many unresolved concerns. We also request time to form a stakeholder work group to address these concerns. The pandemic has caused delays and interruptions to many forms of business. Our members need time to work out the concerns in this draft policy.

Among the many concerns: mixing livestock oversight with non-livestock, unclear/overreach on stockpiling and composting, concern of complaint abuse from urban neighbors, no uniformity of enforcement (left completely up to local health officer), and more.

Thank you for your time, your consideration, and the opportunity to comment.

Sincerely,

Dana Chambers President

Back Country Horsemen of Washington

president@bchw.org

Wings of Rescue is Sasking for donations.

June 13, 2020 at 3:44 PM · 🚱

What has 996 legs, weighs 7,151 pounds and flies? The answer is the 201 dogs 43 cats and 5 rabbits who flew on Wings of Rescue's flights over the last 48 hours! from overcrowded shelters in Texas, the Bahamas, Louisiana and Mississippi We want to send a huge thank you to IFAW and the Petco Foundation! Wings of Rescue will be back in the air over the next few weeks with flights from Louisiana, Texas, Oklahoma, Mississippi and Puerto Rico. Please support our rescue flights by donating online at

www.wingsofrescue.org//donate or by mailing a check to Wings of Rescue P.O. Box 21747, Seattle, Wa. 98111.

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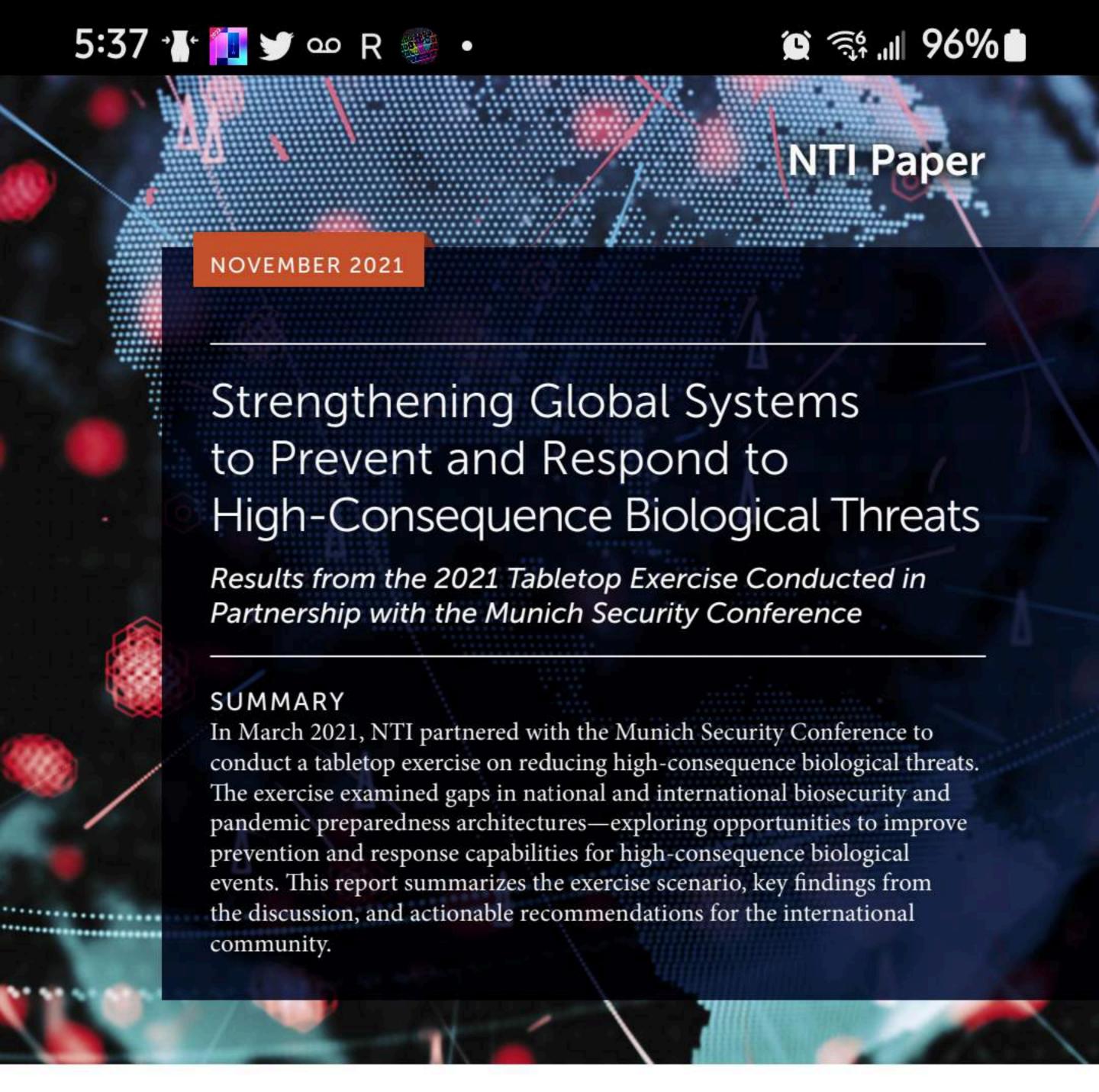




Wings of Rescue Nonprofit Organization

Send message





Jaime M. Yassif, Ph.D. Kevin P. O'Prey, Ph.D. Christopher R. Isaac, M.Sc.



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To: Washington State Board of Health

Date: April 26, 2022

RE: Proposed rulemaking: WAC 246-203-130 Domestic Animal Waste

Dear Members of the Board of Health,

The Washington Farm Bureau is the state's largest general agricultural organization representing more than 47,000 member families statewide. We are a voluntary, grassroots advocacy organization representing the social and economic interests of farm and ranch families at the local, state and national levels. That is why Washington Farm Bureau is called the voice of agriculture.

In July 2019 we provided written comments expressing the serious concerns we had with staff-generated amendments to WAC 246-203-130 related to animal waste. We found the amendatory language was too broad, exceeded the scope outlined in the originating CR-101, created opportunities for frivolous and expensive lawsuits, duplicated existing state and federal laws addressing manure management on ranches and dairies, impacted the protections provided to our farmers under the state's Right to Farm laws and created create an unfunded mandate on local governments.

The March 2022 version of the draft rule represents an improvement over earlier drafts, but still has internal problems that need to be addressed if the rule is to be eventually approved.

Here are the remaining areas of concern:

Expands authority of LHO beyond provided statutory authorities.

o In subsection (1) of the proposed rule it states, "The purpose of this section is to establish standards for the prevention, control, and abatement of health-hazards-and-nuisance detrimental to human health related to the disposal of domestic animal waste..." (emphasis added). The proposed rule also states in (2)(g) that ""Nuisance" includes an act of omission that harms, endangers, or interferes with the health or safety of another person." (emphasis added). The inclusion of "safety" in this definition seeks to broaden the authority of local health officers far beyond what is provided in state law. Laws for worker safety are found in the authorizing statutes for Department of Labor & Industries.

Wrong WAC cited for livestock manure management.

o In subsection (3)(d)(i) it states that domestic animal waste from livestock that is collected and stockpiled for later use or disposal must be stored in a manner that controls odors and attraction of flies, rodents, and other vectors. In the "Significant Legislative Rule Analysis" presented to the BOH dated March 1, 2022, it states on page 3 under "Rationale for Determination" the following: "This standard incorporates by reference, without material

change, standards/rules of another Washington state agency. It incorporates requirements of the state solid waste rules, chapter 173-350 WAC, including WAC 173-350-320(6) regulating agricultural waste piles."

However, subsection (6) of WAC 173-35-320 is the wrong subsection since it is for "Piles used for storage or treatment – Permit requirements." In this section it does require the operator to ensure the facility is operated in a way as to control nuisance odors, as well as litter, dust, rodents, insects, etc. However, subsection (6) is the wrong section to cite since it addresses permitted activities. Agricultural wastes are addressed in subsection (2) under the title "Piles used for storage or treatment – Permit exemptions." This section includes the following language: "In accordance with RCW 70.95.305, facilities managing solid wastes in piles meeting the conditions listed in Table 320-A and the conditions of (a) of this subsection are exempt from solid waste handling permitting." (emphasis added). Table 320-A includes "Agricultural waste and on-farm vegetative wastes stored on farms." More importantly, subsection (2)(a)(ii) states that farms must "Manage the operation to prevent fugitive dust and the attraction of vectors..." WAC 173-350-100 further clarifies that subsection (2) is the appropriate language by defining agricultural waste to include livestock manure.

Please note that WAC 173-35-100 (2) does not include any requirement for odor control. Therefore, the addition of the requirement to control odor in your proposed rule has no legal or statutory standing and must be removed.

Violates the state's Right to Farm law.

The Washington State Right to Farm law states in RCW 7.48.305 that "agricultural activities conducted on farmland and forest practices, if consistent with good agricultural and forest practices and established prior to surrounding nonagricultural and nonforestry activities, are presumed to be reasonable and shall not be found to constitute a nuisance <u>unless the activity or practice has a substantial adverse effect on public health and safety.</u>" (emphasis added). The proposed rule before you has no qualifying language such as this. Rather it provides a broad requirement the stored waste must be managed to control odors, whether a public health issue has been determined to exist. Is the premise behind the proposed rule that any and all odors present a public health risk? In addition, nothing in your documentation cites any scientific research, or state and federal laws to substantiate this expansion of authority. Please also note that RCW 7.48.310, also part of the Right to Farm law, includes odors as a normal, acceptable condition related to agricultural activities.

Additional specificity required

o In subsection (4), the proposed rule states that "Before taking enforcement action the local health officer <u>must attempt</u> to communicate with the person who may be in violation of this section in order to explore the facts and, if the local health officer determines that a violation has occurred, <u>allow the person reasonable time</u> to correct the violation."

(emphasis added). We appreciate this language to allow for a conversation and the ability for additional information to be collected before enforcement action is taken. However, we are concerned that there are no details or specifics for what constitutes an "attempt to communicate" or what is a "reasonable time" to correct the violation. Additional specifics are needed to provide the required transparency for the overall process that will be used, and to increase justice and equity by ensuring all citizens are treated equally and that the rule is implemented in a uniform manner statewide.

Pasture livestock and Free-range grazing

- Earlier versions of the proposed changes to WAC 246-203-130 excluded both "pasture livestock" and "free-range grazing" from the requirements of this rule. The March 2022 version no longer specifically excludes pasture livestock. By what principles, proven health concerns, or medical or scientific findings did you justify the removal of pasture livestock from this exemption?
- For the purposes of this proposed rule, what do these two terms mean and what are the specifics or definitions that a LHO will use to determine whether livestock in a pasture fall into either of these two categories. Please note, that in general livestock producers do not use these terms. I encourage you to do a Google search for "free range grazing" and you will find pictures or written descriptions of pasture livestock. Free-range grazing is more popularly used as a synonym for organically raised rather than a rangeland management practice.

Inaccurate Small Business Economic Impact Statement

The data used to validate the SBEIS is woefully inadequate. Of the 1000 businesses identified to receive the cost survey, only 41 or 4.1 percent of the recipients responded. Worse yet, the USDA National Agricultural Statistics Service (NASS) has identified 12,656 farms in Washington that raise cattle or pigs. That means the BOH reached out to less than 8 percent of just the cattle and pig producers in the state identified by NASS. This does not even include farms that raise other types of livestock. This is clearly not enough data to adequately quantify the potential impacts of this proposed rule.

Given these serious issues, both technical and policy based, we request that the Board delay action on this proposed rule and create a work group with key stakeholders to help address the many problems that we and others have raised.

Sincerely,

Tom Davis

Government Relations Director



About the Nuclear Threat Initiative

NTI is a nonprofit global security organization focused on reducing nuclear and biological threats imperiling humanity. www.nti.org

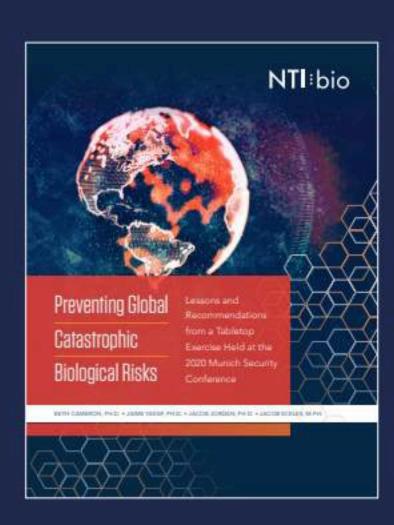
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June 2019

A Spreading Plague: Lessons and Recommendations for Responding to a Deliberate Biological Event

Beth Cameron, Ph.D., Rebecca Katz, Ph.D., M.P.H., Jeremy Konyndyk, M.S.F.S., and Michelle Nalabandian, M.F.S.



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September 2020

Preventing Global Catastrophic Biological Risks: Lessons and Recommendations from a Tabletop Exercise Held at the 2020 Munich Security Conference

Beth Cameron, Ph.D, Jaime Yassif, Ph.D., Jacob Jordan, Ph.D., and Jacob Eckles, M.P.H.

For more information visit www.nti.org/bio.



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May 2, 2022

Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

Dear WA State Board of Health,

We are the Friends of Toppenish Creek from Yakima County.

Friends of Toppenish Creek is dedicated to protecting the rights of rural communities and improving oversight of industrial agriculture. FOTC operates under the simple principle that all people deserve clean air, clean water and protection from abuse that results when profit is favored over people. FOTC works through public education, citizen investigations, research, legislation, special events, and direct action.

We appreciate your hard work on WAC 246-203-130, especially the comprehensive paper, "Keeping of Animals". The documentation of health impacts deserves close attention.

- 1. In 2013 Davis et al found higher rates of campylobacteriosis in Whatcom and Yakima Counties, the WA counties with the highest concentrations of dairies and dairy animals.* Please add this research to your literature review.
- 2. Unfortunately, the document "Keeping of Animals" is no longer up to date. Since 2018:
 - a) The WA Legislature has approved the HEAL Act and the Climate Commitment Act.
 - b) Staff at the WA State Dept. of Agriculture have discounted the value of Tech Note 23 assessments for manure lagoons.
 - c) Ecology has not completed a plan for nonpoint source pollution as promised.
 - d) There is even more data that documents egregious pollution of WA aquifers by concentrated animal feeding operations (CAFOs).
 - e) The Yakima Regional Clean Air Agency (YRCAA) has rescinded their Air Quality Management Policy for Dairies.

- f) People who live in areas with high levels of fine particulate matter from CAFO emissions have suffered higher than average rates of morbidity and mortality from COVID 19.
- g) The WA State Court of Appeals ruled that the WA Pollution Control Hearings Board erred. Ecology's 2017 National Pollutant Discharge Elimination System (NPDES) permit does not protect waters of WA State.

Below is a more thorough analysis of "Keeping of Animals" that explains the need for updates, followed by a critique of BOH's Cost Benefit Analyses.

- 3. RCW 43.20.050 (c) states, "the State Board of Health shall . . . adopt rules and standards for prevention, control, and abatement of health hazards and nuisances related to the disposal of human and animal excreta and animal remains". We find no authority to delegate this duty to either the WA State Dept. of Agriculture or the WA State Dept. of Ecology. In fact, neither of these agencies are qualified to address human health.
- 4. RCW 34.05.310 addresses negotiated rule making. We are not sure whether the actions leading up to this draft rule constitute negotiated rule making or not. We do know that the BOH convened two stakeholder meetings in 2019 to discuss the rule. There were more advocates just for the dairy industry than advocates for the citizens. The beef industry brought their lobbyists as well. Only FOTC argued for protection of CAFO neighbors. Everyone at the table was Caucasian.

If this is negotiated rule making, there are insufficient protections to ensure that other agencies will do their part to protect public health. Currently Ecology and WSDA have the power to control air and water pollution, but they do not use that power, so air and water pollution from dairies continue. There are no memoranda of understanding to guarantee cooperation and collaboration.

Sincerely, Jean Mendeza

Jean Mendoza

Executive Director, Friends of Toppenish Creek

3142 Signal Peak Road

White Swan, WA 98952

^{*} Davis, M. A., Moore, D. L., Baker, K. N., French, N. P., Patnode, M., Hensley, J., ... & Besser, T. E. (2013). Risk factors for campylobacteriosis in two Washington state counties with high numbers of dairy farms. *Journal of clinical microbiology*, *51*(12), 3921-3927. Available at https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3838072/

KEEPING OF ANIMALS Background and Policy Recommendations of the Washington State Board of Health for Revising WAC 246-203-130

https://sboh.wa.gov/sites/default/files/2022-01/KeepingOfAnimals-FinalReport.pdf

Pages 4 & 15:

Regulation of livestock manure, commercial animal feeding operations, and other domestic animal waste in Washington to protect water and air quality is framed mainly around the following:

- Dairy licensing
- National Pollutant Discharge Permits
- Nonpoint source pollution prevention
- Local ordinances
- Air quality control by Ecology and local air agencies

Response:

WA dairies are required to have nutrient management plans, but they are not required to follow them. See "Keeping of Animals" page 15 that says, "The law does not require producers to follow the (nutrient management) plans."

Dairies are only inspected every 18 - 22 months and the inspections focus on what is written on paper, not on what is happening on the dairy. There is only one WSDA inspector for all Eastern Washington where 2/3 of WA milk cows are housed.

Less than 10% of WA dairies have NPDES permits. Permitted dairies in Yakima County apply manure in quantities that greatly exceed agronomic rates.¹

Ecology has yet to complete a nonpoint source pollution plan for the state. Ecology has worked on nonpoint source pollution since 2015 and is nowhere completion.³

Local ordinances are almost non-existent and are not enforced by local agencies, at least not in Yakima County.⁴

¹ Reports available on the Ecology PARIS website at https://apps.ecology.wa.gov/paris/PermitLookup.aspx

² See Attachment 1

³ Ecology Voluntary Water Guidance for Agriculture at https://ecology.wa.gov/About-us/Accountability-transparency/Partnerships-committees/Voluntary-Clean-Water-Guidance-for-Agriculture-Adv

⁴ See Attachment 2 – Email from the Yakima Health District re enforcement of Solid Waste Manure Composting rules

The Yakima Regional Clean Air Agency (YRCAA) rescinded an Air Quality Management Policy for Dairies in 2019. The YRCAA does not investigate air quality complaints against dairies and has never issued a notice of violation of odor or dust. Washington CAFOs do not report hazardous air emissions.

The summary in "Keeping of Animals" gives the impression that other WA agencies address pollution from WA CAFO dairies. This is incorrect.⁶

Page 10:

The Lower Yakima Valley is similarly plagued by high nitrate levels in drinking water that are closely associated with significant numbers of farm animals and large animal feeding operations. Yakima County has the most dairy cows in the state (WSDA, 2011). About a third of the Lower Yakima Valley uses private, unregulated wells for drinking water. Between 10 and 20% of these wells have nitrate concentrations that exceed the national and state drinking water standard (USEPA, 2012b).

In 2018-2019 the Lower Yakima Valley Groundwater Management Area drilled 30 monitoring wells evenly spaced throughout the Lower Yakima Valley (LYV). At the time of drilling 45% of the wells had nitrate levels above 10 mg/L. Beginning in 2021 Ecology began sampling the monitoring wells to establish a baseline for the area. In the first two 2021 samplings 45% of the samples were above 10 mg/L.^{7, 8}

The EPA has studied nitrate levels in dedicated monitoring wells on a cluster of LYV dairies. The highest reading in the EPA studies is 234 mg/L.⁹

⁵ Arguments for Dissolving the Yakima Regional Clean Air Agency at http://www.friendsoftoppenishcreek.org/cabinet/data/FOTC%20Arguments%20for%20Dissolving%20the%20YRC

AA.pdf

⁶ Ecology and WSDA knew about pollution on a cluster of Lower Yakima Valley dairies for years, but gave the dairies glowing reports while the dairies applied manure to cropland at up to seven times agronomic rates. See Attachment 3.

⁷ LYV GWMA Initial Ambient Groundwater Monitoring Well Report at https://www.yakimacounty.us/DocumentCenter/View/21633/GWAC-Presentation---Monitoring-Well-Report-Overview---2019620-v20-1

⁸ WA Ecology Environmental Information Management System Data Base Groundwater Data at https://apps.ecology.wa.gov/eim/search/Groundwater/GWSearch.aspx?SearchType=Groundwater&State=newsearch &Section=all

⁹ EPA Region X LYV Groundwater Fact Sheet 2014 Yakima Dairies Consent Order Update at https://www.epa.gov/sites/default/files/2017-12/documents/lower-yakima-valley-groundwater-fact-sheet-december-2014.pdf

Page 15:

WSDA has conducted lagoon inspections in the Yakima Valley based on the site inventory and assessment procedure of Natural Resources Conservation Service (NRCS) Tech Note 23. Between 2015 and 2017, WSDA inspected most dairy lagoons in the Yakima Valley with a minimum of two site visits, to evaluate the lagoons when full and when empty. The lagoons are scored on criteria (e.g., soil type, aquifer susceptibility, proximity to water bodies, compliance with design standards) and ranked on a risk probability matrix for site risk and seepage/structure risk. The evaluations are being carried out in concert with the CAFO permit, giving facilities with high risks two years to develop and implement plans to address the deficiencies.

WSDA now says that the Tech Note 23 Inspections re invalid. WSDA has not completed Tech Note 23 Inspections outside Yakima County as promised. Tech Note 23 Inspections in Yakima County are missing essential data and those dairies with high risk lagoons have not developed and implemented plans to address the deficiencies as stated in "Keeping of Animals" 10

Page 16:

Any commercial or industrial operation that discharges waste material to state waters is required to have a permit from Ecology.

This is simply not true. Two dairies in the LYV dairy cluster that have well documented discharges are not covered by NPDES permits.¹¹

Discharges are allowed in limited situations and cannot violate water quality standards or impair other uses of the waters.

Many dairies in Whatcom County are located in flood plains. Manure from these dairies flowed into the floodwaters of the Nooksack River in 2021. Taxpayers spent hundreds of thousands of dollars to help Whatcom County dairies pump manure from lagoons that were at risk of overtopping during the 2021 floods.¹²

¹⁰ See Ecology and WSDA Do Not Inspect Manure Lagoons at http://www.friendsoftoppenishcreek.org/issues/water.html

¹¹ The EPA has found egregious pollution from crop land and from unlined manure lagoons on the Henry Bosma Dairy and the Liberty Dairy in the LYV dairy cluster. Neither of these dairies has an NPDES permit.

¹² Verbal communication from Laura Watson, Director of the WA Dept. of Ecology at the April meeting of Ecology's Ag and Water Quality Advisory Committee.

Decision on CAFO Permit Appeal On October 25, 2018, the Washington State Pollution Control Hearings Board (PCHB) issued an order on an appeal of the CAFO permits by a number of organizations on all sides of the issue. The order upheld and affirmed the permits with the exception of a condition associated with lagoon assessments. Ecology is expected to reissue the permits consistent with the order (WSPCHB, 2018).

A coalition of environmental groups successfully appealed the PCHB decision to the WA State Court of Appeals. In 2021 the Court of Appeals ruled that the 2017 NPDES permits for CAFOs do not protect waters of the state. ¹³

Ecology and WSDA jointly administer CAFO permits and also work cooperatively on the Dairy Nutrient Management Program and Agricultural Nonpoint Source Program. The agencies are guided by a Memorandum of Understanding (MOU) that was last updated in 2011.

The referenced MOU protects WA dairies from enforcement of the Clean Water Act. The WSDA Dairy Nutrient Management Program (DNMP) hardly ever documents a discharge to waters of the state. Consequently, there is no justification for requiring a dairy to obtain an NPDES permit. The DNMP typically states that a dairy complies with best management practices (BMPs) although WSDA and Ecology state that there is no approved list of BMPS for dairies.¹⁴

Page 19:

Ecology is currently undertaking a major project to develop voluntary clean water guidance for agricultural activities. The project aims to identify agricultural practices that are most effective in addressing nonpoint source impacts and achieving compliance with water quality standards. Impetus for the project is federal law, specifically the Clean Water Act and Coastal Zone Act Reauthorization Amendments of 1990, which require the agency to identify suites of practices for different sources of nonpoint pollution. The project is part of Ecology's 2015 Nonpoint Source Pollution Plan. The planning, stakeholder involvement, and technical analysis are expected to take a couple years (WSDOE, 2015b, 2015c, 2017).

After at least seven years Ecology's nonpoint source plan is nowhere near completion.³

¹³ Puget Soundkeeper et al v. WA Ecology 2021, available at http://www.friendsoftoppenishcreek.org/cabinet/data/D2%2052952-1-II%20PUBLISHED%20OPINION%20(2).pdf

¹⁴ WSDA & Ecology Memorandum of Understanding – A Chain of Errors, available at http://www.friendsoftoppenishcreek.org/cabinet/data/MOU%20Problems%20and%20Sequelae.pdf

Page 20:

RCW 7.48.305 explains that agricultural activities that are consistent with good practices and that conform with all applicable laws and rules are assumed to be reasonable and do not constitute nuisance unless the activity has a substantial adverse effect on public health and safety.

In Yakima County officials have never investigated the adverse public health effects of agricultural activities such as:

- Polluting groundwater
- Polluting surface waters and contaminating fish
- Polluting the air with particulate matter, ammonia, hydrogen sulfide, volatile organic compounds, ozone, methane, and nitrous oxide. ⁵

Because there are no documented impacts officials refuse to take actions against allegedly "good agricultural practices" such as:

- Composting hundreds of dead cows in small areas
- Composting manure in the pens where cows live
- Discharging pollutants into aquifers that people access for drinking water.⁵

Morbidity and mortality from COVID 19 are well above the state average in Yakima County. Harvard University has documented a relationship between counties with high levels of particulate matter and deaths from COVID 19.¹⁵

Chapter 35.88 RCW applies to protection of public water supplies and explains that animal operations such as hog pens and feed yards that pollute municipal water supplies, storage, or conveyance are illegal and should be abated as nuisance.

The Outlook Elementary School in Yakima County had to drill two new wells due to nitrate contamination. The only likely source of this pollution is nearby dairies with well documented discharge to groundwater. Officials took no actions against the dairies but simply expected taxpayers to cover the expense of drilling new wells.

The City of Mabton has been forced to drill several new municipal wells due to a falling aquifer and nitrate contamination that reached 20 mg/L. Officials took no actions against upgradient dairies but simply expected taxpayers to cover the expense of drilling new wells.

⁵ Arguments for Dissolving the Yakima Regional Clean Air Agency at http://www.friendsoftoppenishcreek.org/cabinet/data/FOTC%20Arguments%20for%20Dissolving%20the%20YRC AA.pdf

¹⁵ COVID 19 Incidence and Death Rates for Yakima County, available at http://www.friendsoftoppenishcreek.org/cabinet/data/COVID%2019%20Demographics%20for%20Yakima%20County%20IV.pdf

RCW 70.54.010 and RCW 90.48.080 respectively make it illegal to deposit anything deleterious that affects public water supplies or to discharge polluting matter to waters of the state.

Dairy discharges to waters of the state are well documented, yet Ecology does nothing to stop this illegal activity.

Chapter 70.95 RCW sets requirements for solid waste management, which extends to animal waste and includes provisions that prohibit dumping or depositing waste in waters of the state or creating a nuisance. Companion solid waste handling standards, chapter 173-350 WAC, exempt land application of manure if applied at agronomic rates. If piled, over-applied, or otherwise mismanaged to create a problem, manure can be regulated as a solid waste.

Over application of manure to cropland is well documented, yet WSDA and Ecology do nothing to stop this illegal activity. ^{1, 2, 6, 9}

Page 21:

King County first adopted its livestock management ordinance in the mid1990s. The purpose of KCC 21A.30, sections 040 – 075, is to support the raising and keeping of livestock and to minimize impacts on water quality and salmon habitat. The code also regulates small animals. The code regulates lot size, livestock densities, farm planning, and management practices to prevent nonpoint pollution. The management standards include many requirements for manure storage and spreading. Section 122 of KCC 21A.12 complements this with a manure storage setback of 35 feet from the property line. Commercial dairies are exempt and must meet the requirements of DNMP (King County, 2009, 2013).

The Keller Dairy in King County, located next to the Snoqualmie River, spreads manure within 10 feet of the river, according to their manure pollution prevention plan (MPPP).

¹ Reports available on the Ecology PARIS website at https://apps.ecology.wa.gov/paris/PermitLookup.aspx

² See Attachment 1

⁶ Ecology and WSDA knew about pollution on a cluster of Lower Yakima Valley dairies for years, but gave the dairies glowing reports while the dairies applied manure to cropland at up to seven times agronomic rates. See Attachment 3.

⁹ EPA Region X LYV Groundwater Fact Sheet 2014 Yakima Dairies Consent Order Update at https://www.epa.gov/sites/default/files/2017-12/documents/lower-yakima-valley-groundwater-fact-sheet-december-2014.pdf

See the Keller Manure Pollution Prevention Plan, page 11/22 that says:

In addition to using the MSA and ARM tools year-round, the appropriate seasonal setback distance will be utilized when applying manure. These seasonal setbacks are based on scientific studies which recommend specific distances for sediment and nutrient removal based on seasonal precipitation, soil saturation conditions, and surface runoff potential. This includes a more robust setback during the high risk months of October 1-February 28 of 100 feet, reduced to 40 feet from March 1-May 31 and September 1-September 30 when soils are drying, and 10 feet in the dry summer months of June 1-August 31 when precipitation is minimal and soils dry. The following table lists the appropriate setback distances per season. 16

Page 24:

Registration and Reporting: Feedlots with 1,000 or more cattle in operation between June 1 and October 1 are required to register with Ecology or their local air agency under WAC 173-400-099 to WAC 173-400-104, report emissions of certain criteria and toxic air pollutants, and undergo inspections every one to three years. Emissions are estimated based on the size, processes, and pollution controls of the animal feeding operation. Ecology recently conducted a comprehensive literature review and issued revised emissions factors for cattle feedlots in 2016.

Are dairies classified as feedlots? None of the 50 CAFO dairies in Yakima County register as sources of air pollution, or report emissions of air pollutants. There are about 100,000 milk cows in a 273 square mile area in the Lower Yakima Valley (LYV).

Controlling Fugitive Emissions, Dust, and Odor: Under RCW 70.94.640, odors or fugitive dust from animal feeding operations that are applying BMPs¹⁷ are exempt from the requirements of the state Clean Air Act unless they have a substantial adverse effect on public health. Feedlots with 1,000 or more cattle are included in this agricultural activity exemption except they must:

- Follow BMPs¹⁷ and develop and implement a fugitive dust control plan;
- Comply with the State Implementation Plan (SIP) for air quality; and
- Additional controls may be required as part of the SIP if an area is designated as nonattainment for particulate matter under national ambient air quality standards (NAAQS).

¹⁶ Manure Pollution Prevention Plan (MPPP) Keller Dairy, page 11/22, available at file:///C:/Users/Jean%20Mendoza/Downloads/2020-07-28%20MPPP%20(5).pdf

¹⁷ According to WA Ecology there are no approved best management practices for WA dairies. See Attachment 4.

Ecology or the appropriate local air agency review and approve fugitive dust control plans, inspect sources, respond to complaints, provide compliance assistance, and may issue enforcement actions. In 1995, Ecology issued guidelines on fugitive dust control for beef cattle feedlots and best management practices. These guidelines are included in the SIP to help the state meet and maintain the NAAQS and protect public health. Yakima Regional Clean Air Agency has also established policies and BMPs for animal feeding operations in their jurisdiction, specifically for dairy operations, confined heifer replacement feeding operations, and confined beef cattle feeding operations. As an added note, Ecology is working to interpret and implement changes to RCW 70.94.640 made in the 2017 legislative session by SSB 5196 (C 217, L 17) that extend the Clean Air Act exemption for odor and fugitive dust caused by agricultural activities to cattle feedlots. This will change aspects of the regulatory structure when finalized.

Washington law requires Ecology to approve a list of best management practices for CAFOs. Friends of Toppenish Creek submitted public records requests for a listing of these BMPS in 2021. Both Ecology and WSDA replied that there are none.¹⁷

The Yakima Regional Clean Air Agency rescinded their policy for dairies in 2019. The YRCAA does not investigate complaints regarding odor and dust from dairies.⁵

Page 25:

Capitalize on Local Health Authority The rule should capitalize on the authority and responsibility of local health boards and local health officers under chapter 70.05 RCW. This includes authority to:

- Supervise the maintenance of all health and sanitary measures;
- Enact and enforce local regulations as needed to preserve, promote, and improve public health; and
- Provide for the prevention, control, and abatement of nuisances detrimental to public health.

In response to a 2021 public records request the Yakima Health District informed FOTC that the YHD does not enforce WAC 173-350-220 with respect to manure composting facilities.

⁵ Arguments for Dissolving the Yakima Regional Clean Air Agency at http://www.friendsoftoppenishcreek.org/cabinet/data/FOTC%20Arguments%20for%20Dissolving%20the%20YRC <a href="http://www.friendsoftoppenishcreek.org/cabinet/data/FOTC%20Arguments%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20Dissolving%20for%20for%20for%20for%20for%20for%20Dissolving%20for%2

⁴ See Attachment 2 – Email from the Yakima Health District re enforcement of Solid Waste Manure Composting rules

Leave Regulation of Large Animal Feeding Operations to Established Programs WSDA manages the Dairy Nutrient Management Program and Ecology and WSDA comanage the CAFO permit. For many reasons, the programs are complicated and hard to implement. Despite the challenges, the two agencies are best positioned to regulate the state's large commercial animal feeding operations given their legal authorities, expertise, resources, and support from many partner agencies. The same holds true for regulation of air emissions by Ecology and the local air agencies. In keeping with the preceding recommendations, the Board's rule should avoid duplicating core work of these programs and should aim to support these existing state programs with complementary authority and functions.

We have shown that Ecology and WSDA have failed to protect the environment from water and air pollution related to CAFO dairies. These agencies barely talk about human health. Leaving implementation of public health to Ecology and WSDA is a recipe for failure.

Small Business Economic Impact Statement WAC 246-203-130 a Rule Concerning Keeping of Animals

Page 4:

NAICS Code 1121, Description "Cattle Ranching and Farming", # of businesses in WA "534", MCT (1% average annual payroll) "\$3,657.58", MCT (0.03% annual receipts) "\$3,864.14"

We believe the cost estimates in this category that includes the multi-million dollar dairy industry, are inaccurate. We do not believe that the payroll for veterinary services exceeds the payroll for dairies as stated in the Economic Impact Statement.

Significant Legislative Rule Analysis WAC 246-203-130 a Rule Concerning Keeping of Animals Revising the Section Title to Domestic Animal Waste

Page 16:

WAC 246-203-130(3)(d)(iii)(D)(II) Site stockpiled livestock waste one hundred feet or more from a surface water body unless the surface water body is protected by one or more control or treatment practices that capture and prevent leachate and runoff.

Description: If waste from livestock is stockpiled for later use or disposal, this proposed exception to WAC 246-203-130(3)(d)(iii)(D) allows people to site stockpiles closer than one hundred feet of a surface water body if practices are applied to mitigate runoff and leachate. This can include practices to mitigate stockpiles such as covers and pads, or alternate methods of storing stackable waste, such as stacking and composting structures.

Common conservation practices for stackable waste include the following, listed by NRCS code. Practices can be applied individually or in combination. Practices may or may not be designed and constructed to NRCS standards but should always be designed to account for anticipated storage needs, surface loads, drainage, and possible seepage.

This section fails to inform the reader that the definition of "stockpiling" in the draft WAC 246-203-130 exempts manure composting and manure lagoons from the definition. In Yakima County there are over 500 acres of manure compost on bare ground. In Yakima County there are over 200 acres of manure lagoons, and most are simply "clay lined" which means they are lined with compacted soil. Leaching from these lagoons is significant and well documented. In Yakima County there are over 200 acres of manure lagoons, and most are simply "clay lined" which means they are lined with compacted soil. In Yakima County there are over 200 acres of manure lagoons, and most are simply "clay lined" which means they are lined with compacted soil. In Yakima County there are over 200 acres of manure lagoons, and most are simply "clay lined" which means they are lined with compacted soil. In Yakima County there are over 200 acres of manure lagoons, and most are simply "clay lined" which means they are lined with compacted soil.

WAC 246-203-130 does not sufficiently address groundwater pollution or air pollution.

NRCS standards are guidelines and non-enforceable.

¹⁸Lower Yakima Valley Groundwater Management Area Nitrogen Availability Assessment at https://www.yakimacounty.us/2131/Nitrogen-Availability-Assessment

¹⁹ Bosma Dairy Lagoon 3 shows massive nitrogen loadings leading to ground water contamination, available at http://charlietebbutt.com/files/CAFOs/Bosma%20Lagoon%203%20Abandonment%20Plan_20220118.pdf

Attachment 1: Reports available on the Ecology PARIS website at https://apps.ecology.wa.gov/paris/PermitLookup.aspx

Annual NPDES reports from DBD Dairy 2018 to 2021

Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions Based Upon Trends	Comments				
Low	24	10							
-0.6 -0.7 No	Old Mint	3		Account					
all Soil Test Nitrate Range: • Less than 15 ppm			None	None	Canal break resulted in no water for 1.5 weeks, resulting				
Less than 55 lbs/acre	8				in loss of yield.				
		No.		Militaria de la Cal	THE PERSON NAMED OF THE PE				
Medium	018	17							
	02EC	18							
all Soil Test Nitrate Range:	08-11B	27	Continue with agronomic rate	None	Canal break resulted in no water for 1.5 weeks, resulting in loss of yield.				
• 15-30 ppm				0.000000	in loss of yield.				
• 55-110 lbs/acre				L					
The second second	02FB	45							
High		45	3' samples to be taken						
High 02EB 07 07 08-11C 21 21 22CP 22CP		46	next fall.						
	21	42	N. N	None	Canal break resulted in no water for 1.5 weeks, resulting				
	22CP	39	Re-evaluate agronomic	11 8000000	in loss of yield.				
• 111-103 ms/acre	23	36	rate.						
Very High	01C	117							
	02NWB	65							
all Soil Test Mirrate Cange	02SWB	52	3' samples to be taken						
 More Haar 45 nom 	02WC	67	next fall.						
 More than 165 	03B	161	1970 A 1980 A		Canal break resulted in no water for 1.5 weeks, resulting				
	03C	140	Reduce application		in loss of yield.				
	04	64	(evaluate agronomic	None at this time	5 6 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
	05	65	rate).	The second of th	Some fields have produced residual ppm levels that are				
	06	54	87 - 77 - 77 - 77 - 78		well above what would typically be expected given the applied manure rates.				
	2255	63	Get approval of nutrient		applied institute races.				
	25	48	budget from DOE.						

DBD WASHINGTON, LLC					
Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions based upon Trends	Comments
Low Fall Soil Test Nitrate Range Less than 15 ppm Less than 55 lbs/acre	Old Mint	1.7	None.		
Medium	01 C	30.3	Continue with agronomic		
all Soil Test Nitrate Range	08-11 C	18.8	rate.		
• 15-30 ppm	22 SS	21.9	1460		
• 55-110 lbs/acre	25	19.3			
linh	02.50	20.2	* 0		
	02 EC	38.3	Adjust application timing.	None at this time	
igh all Soil Test Nitrate Range • 31-45 ppm • 111-165 lbs/acre	04	40.5	3' fall soil sampling.		
	06	40.1	Adjust application rates		
	23	39.6			
	24	32.3			
	24	38.8			
			14-1-1-1		
	01 B	62.3	Adjust application timing.	None at this time	Emergency applications in 2019 are the main
	02 EB	67.5	3' fall soil sampling.		reason for the higher residual nitrate levels
 Nilse than 45 ppm 	02 NWB	94.1	Reduce application rate		2 S = 1. S = 1. S = 1.
More than see the factor	02 SWB	48.5			
	02 WC	56.6	Get DOE approval for		
	03 B	132.7	nutrient budgets.		
	03 C	143.5			
	05	47.7			
	08-11 B	53.4			
	21	50.4			
	22 CP	50.2		/	

Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions Based Upon Trends	Comments
Low	23	14.3			
Fall Soil Test Nitrate Range: • Less than 15 ppm	25	8.0			
Less than 55 lbs/acre	Old Mint	5.5			
Medium	06	28.9			
Fall Soil Test Nitrate Range:	07	24.2			
 15-30 ppm 55-110 lbs/acre 	22 SS	16.6			
- 33-110 lbs/acre	24	29.0			
High		1			
	01 C	43.9			
Fall Soil Test Nitrate Range:	02 EC	41.2	The nutrient budgets will be		
31-45 ppm 111-165 lbs/acre	02 SWB	33.5	adjusted downward		
TAX ADDIDGUCE	05	40.8			
The same of	01 B	50.7			
Very High	02 EB	65.1			
Fall Soil Test Nitrate Range:	02 NWB	50.0	1		
More than 45 ppm	02 WC	54.7	1		
More than 165 lbs/acre	03 B	164.9	The following fields will receive limited to no		
	03 C	193.3	application until the values		
	04	48.2	come down. Values are down		
	08-11 B	95.5	from 2019.		
	08-11 C	126.5			
	21	66.1			
	22 CP	62.5			

Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions Based Upon Trends	Comments
Low	Field 07	11.0	None		
Fall Soil Test Nitrate Range:	Field 22 SS	5.1		1	
Less than 15 ppm	Field 25	5.3			
Less than 55 lbs/acre	Old Mint	12.6			
Medium					
Fall Soil Test Nitrate Range:	Field 02 EC	15.5	None		
• 15-30 ppm	Field 05 Field 06	25.3 16.9			
 55-110 lbs/acre 	Field 08-11 C	23.0			
	Field 23	25.3			-
	Theid 23	25.5			
High	Field 01 B	41.0	No application for 2022		3)
	Field 01 C	36.6	Reduced application	ji	
Fall Soil Test Nitrate Range: • 31-45 ppm	Field 02 EB	33.0	No application for 2022	ĵ.	
• 111-165 lbs/acre	Field 02 WC	44.8	No application for 2022		
	Field 24	43.5	Reduced application		
/ery High	Field 02 NWB	71.7	No application for 2022	1	Fields in the High to Very High risk levels continue to
real Action	Field 02 SWB	45.5	No application for 2022		decrease as in 2019 there were 17 total fields in these
Fall Soil Test Nitrate Range:	Field 03 B	106.0	No application for 2022		categories and in 2020 there were 15 and now in 2021
 45 ppm More than 165 	Field 03 C	214.7	No application for 2022		there are 13.
lbs/acre		10000000		4	there are 15.
	Field 04	56.0	No application for 2022		
	Field 08-11 B	69.8	No application for 2022		
	Field 21	54.6	No application for 2022		
	Field 22 CP	52.9	No application for 2022		

Annual NPDES reports from Sunnyside Dairy 2019 to 2021

Sunnyside Dairy					
Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions based upon Trends	Comments
Low	70 ac Pivot 02 Karl's	5.3	None.	No trends have been	7
Fall Soil Test Nitrate Range	Airport 02	9.1		established.	
Less than 15 ppm Less than 55 lbs/acre	Airport 03	4.8			
	P01	13.7			
	P02	12.6	8		
	P03	3.1			
the state of the state of the state of	Tom 03 70 ac	5.5			
Medium	70 ac Pivot 01 Karl's	23.6	None.	No trends have been	
Fall Soil Test Nitrate Range	70 ac Pivot 03 Karl's	22.7	8	established.	
• 15-30 ppm	Airport 01	25.0	N .		
 55-110 lbs/acre 	Case	21.1			
	Field 01	18.9		l'	
	Field 02	17.7			
• 55-110 lbs/acre	Field 03 CP	25.6			
	P05	18.0			
	Tom 01	28.4			
	Tom 02	30.7			
High	Field 04	38.9	Adjust application timing.	No trends have been	
Fall Soil Test Nitrate Range	Little Dairy E	35.7	3' fall soil sampling.	established.	
• 31-45 ppm	Little Dairy N	32.3	Document reasons for	established.	
 111-165 lbs/acre 	PO4	36.9	higher residual.		
	Wade's 02	33.5	manual residuals		
Veirveilete	60 ac	125.8	Adjust application timing.	No trends have been	
	100 ac	62.7	3' fall soil sampling.	established.	
a Auto-thum 45 party	Field 03 Linear	51.3	Document reasons for		
Whose charges 5 lbs/Auto-	Field 05	66.4	higher residual.		
 Mure shakeES the/Auto 	Guerra	80.4	Get DOE approval for		
	Little Dairy W	62.2	nutrient budgets.		
	Orchard	65.3			
	Rick	88.3			
	Wade's 01	48.9			
	Wade's 03	181.6			

Sunnyside Dairy					
Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions based upon Trends	Comments
Low	70 ac Pivot 02 Karl's	4	/		
Fall Soil Test Nitrate Range	Airport 01	3			
Less than 15 ppm Less than 55 lbs/acre	Airport 03	4			
	MILESTER VINCE				
Medium	60 ac	24.6			
all Soil Test Nitrate Range	100 ac	29.8			
 15-30 ppm 	Airport 02	15			
 55-110 lbs/acre 	Field 01	22			
	Field 02	24			
	Field 03 CP	16			
	Little Dairy N	17			
	Little Dairy W	26.1			
	P05	30			
	Tom 03 70 ac	15			
	Wade's 01	22.5			
	Wade's 02	22			
High	Case's	100	MEN MEN COLLEGE	No. 351. Epil 24.	
riign Fall Soil Test Nitrate Range		31	Nutrient budgets will be		
31-45 ppm	Field 04	37	adjusted downward		
	Little Dairy E	34			
 111-165 lbs/acre 	P01	15			
	P02	20			l .
	P03	44			
	Rick's	35.5		1	
	Tom 01 N	38		1	1
/ery High:	70 ac Pivot 01 Karl's	60	Nutrient budgets will be		
all Soil Test Altrate Range	70 ac Pivot 03 Karl's	52	adjusted downward.		
More than 45 ppm	Field 03 Linear	56	Some fields will not		
More than 45 ppm More than 165 lbs/scre	Field 05	48	receive nutrient.		
	Guerra	53.6			
	Orchard	70			1
	P04	59			
	Tom 02 W	66			
	Wade's 03	92.9			

Sunnyside Dairy	20	A22	0	120	69
Field Risk Level	Field	Nitrate at 2'	Required Actions	Required Actions based upon Trends	Comments
Low	60 ac	7.9	None		*
Fall Soil Test Nitrate Range	70 Pivot 01 Kari's	8.6	30.71.22.67	1	
 Less than 15 ppm 	100 ac	10.3		1	
 Less than 55 lbs/acre 	70 ac Pivot 01 Karl's	8.6	ŝ	1	
	70 ac Pivot 02 Karl's	8.0		1	
	Field 01	9.0	6	1	
	Orchard	13.4		1	
	Tom 01 N	11.8		1	
	Case's	12.3			
	Tom 03 70 ac	5.6			
	Airport 01	3.4			
	Airport 03	7.5			
Medium	Wade's 02	15.4	None		
Fall Soil Test Nitrate Range	70 ac Pivot 03 Kari's	19.2		1	
15-30 ppm 55-110 lbs/acre	Field 02	22.5	8	1	
	Field 03 CP	23.7	[[1	
	Rick's	15.7	ß.	1	
	Tom 02 W	19.3		1	
	Field 05	28.5		1	
	Guerra	17.6		1	
	Little Dairy E	16.0		1	
	Little Dairy N	20.1		1	
	Little Dairy W	24.6	8	1	
	P 01	23.3			
	P 02	28.2	1		
	P 03	21.9	1		
	P 05	21.9	į.		
High	Field 03 Linear	38.4	Reduce application	Watch Field 03 Linear	
Fall Soil Test Nitrate Range	Field 04	31.8		and Field 04 as two	
 31-45 ppm 	Wade's 01	39.4	1	years in High or Very	
• 111-165 lbs/acre				High	
Very High	Wade's 03	54.8	Reduce application	Watch P04 and Wade's	
More than 45 park	Airport 02	49.4		03 as two years in High or Very High	
More than 165 Bis/acre	P.04	58.3	1	C. very right	

Attachment 2:

Email from Shawn Magee at the Yakima Health District, October 20, 2021:

Follow-Up Info for Public Records Request Email 1 of 2

Good Afternoon Ms. Mendoza,

Below is a the response to the question you asked in a follow-up email for the records request you submitted. Also, attached are the records we have for your follow-up request.

Please note that many facilities, including exempt composters, are supposed to submit a notice of intent – many have not. Also, many facilities, including exempt composters, are supposed to submit an annual report – many have not. These records are from 2010–present.

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Shawn Magee, R.S.

Environmental Health Director

Yakima Health District

Office: (509) 249-6533



Attachment 3: Soil Nitrate Reports from George DeRuyter & Son Dairy



MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0600 7570

Field: GDS-SU-02

Acres:

Sample Date: 10/17/2013

Crop: Triticale-Sudan

Irrigation: Wheel line

Previous Crop: 2013 Alfaifa

Current Crop: 2014 Triticale Sudan

Soil series:

Scoon silt loam

Leach Hazard: Low

99.1

No. of Sites:

30

Topography:

Gently undulating

Avg Sampling Depth: 3.0

Restrictive layer?

Y Where? Gravel on the surface, caliche layer.

Residue Incorp?

N Type? Alfalfa cultivated, Triticale-Sudan planted.

Comments: Sampled a three foot field composite. At sampling the Triticale was at 2-4" tall. Volunteer alfalfa, corn, and weeds. Whitish soil color on the knolls and ridges.

		ppm	Mobile I	Exch. /	(00g)	Other Data								
Sample Area	Depth	NO,	NO,	NH ,	SO.	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	19	65	7	37	1.6	16.20	3.90	1.04	0.30	21.44	19.2	1.25	75%
Field Composite	2	24	81										1.25	88%
Field Composite	3'	14	49										1.25	81%
		Totale	105	7	37	18								

Comments: The residual nitrates are moderate. Ammonium is in equilibrium. Sulfur is adequate, while boron is possibly marginal. Sodium is favorably lower.

		Imn	obile	Nuti	ients	(ppi	n)	Chemical Data				
Sample Area	Depth	PN	acej K	Zn	Mn	Fe	Cu	О.М.	pН	EC mmhos/cm	Eff/Calc.	
Field Composite	1	126	405	12.0	1.3	22	1.7	3.5%	7.3	0.35	Yes	

Comments: The soil P, K, and Zn are sufficient. Mn is low, while Fe and Cu are sufficient. Organic matter is high. Soil pH is near neutral, while salts are low.



AGRIMETRIC SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0560

7572

Field: GDS-SU-04

135.6 Acres:

Sample Date: 10/14/2013

Crop: Triticale-Silage Corn

Irrigation: Center pivot

Previous Crop: Current Crop: 2013 Triticale-Silage corn 2014 Tritticale-Sitage com

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites:

Topography:

Gently divided sloping

Avg Sampling Depth:

Restrictive layer?

Y Where? Some rocks, mainly in the NW corner.

Residue Incorp?

N Type? Scattered cultivation strips.

Comments: Sampled a three foot field composite. Light weed cover. Corn stalk size was normal. Soil surface was

		ppm	Mobile I	Exch. / Soluble Bases (meq/100g)						Other Data				
Sample Area	Depth	NO ,	NO 3	NH 4	SO.	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	184	624	7	925	10.8	17.10	4.80	8.79	1.27	29.96	16.0	1.25	90%
Field Composite	2*	166	564										1.25	85%
Field Composite	3"	173	587										1.25	100%
		Totals:	1774	7	925	10.8								

The residual nitrates are excessive. Ammonium is in equilibrium. Sulfur and boron are very high. Sodium is slightly to moderately elevated.

Immobile Nutrients (ppm)

Chemical Data

Sample Area Field Composite

P P(ccs) K 398 2650 13.5 2.9 O.M. pHEC mmhos/cm 3.3% 7.8

Eff/Calc.

Comments: The soil P and K are very high, and Zn is high. Mn is low, while Iron and Copper are adequate. Organic matter is high. The soil pH remains alkaline and salts are high.

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AGRIMETRIC SERVICES - MEASURIN	IG CROP NEEDS FOR	GREATER PROFITS
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Fertility Report

George DeRuyter & Sons (Y281)

F13-0540

7575

Field: GDS-SU-07

Acres:

Sample Date: 10/9/2013

Crop: Alfalfa

Irrigation: Center pivot

Previous Crop:

2013 Alfalfa Current Crop: 2014 Alfalfa

Soil series:

Warden silt loam

76.6

Leach Hazard: Low

No. of Sites:

30

Topography:

Gently undulating.

Avg Sampling Depth:

Restrictive layer?

Y Where? Rocks in scattered sites.

Residue Incorp?

N Type?

Comments: Sampled a three foot field composite. Harvested recently. Alfalfa at 2-3" tall with a 50% canopy overall.

		ppm	Mobile Nutrients (lbs/ac)				Exch. / Soluble Bases (meq/100g)						Other Data		
Sample Area	Depth	NO,	NO,	NH 4	SO ,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW	
Field Composite	1"	31	104	5	286	5.1	19.90	4.00	1.94	0.72	26.58	16.1	1.25	78%	
Field Composite	2	74	252										1.25	82%	
Field Composite	3"	76	257										1.25	74%	
		Totals:	613	5	286	5.1									

Comments: Residual nitrates are high. Ammonium is in equilibrium. Sulfur and boron are also high. Sodium is only slightly elevated.

		Imm	obile	Nuti	rients	(ppi	m)	Chemica	l Data	,	
Sample Area	Depth	P P(a	™ K	Zn	Mn	Fe	Cu	O.M.	pH	EC mmhos/cm	Eff/Calc.
Field Composite	41	90	757	9.1	1.5	17	2.0	1.9%	7.6	0.48	Yes

Comments: Soil P, K, and Zn are high. Mn is low while Fe and Cu are sufficient. Organic matter is above average. Soil pH is moderately alkaline, while salts are okay.

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Fertility Report

George DeRuyter & Sons (Y281)

F13-0580

7574

Field: GDS-SU-06

Acres:

84.5 Sample Date: 10/16/2013

Crop: Triticale-Silage Corn

Irrigation: Center pivot

Previous Crop: 2013 Triticale-Silage com

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites: 32

Current Crop: 2014 Triticale-Silage com

Topography:

Gently undulating

Avg Sampling Depth: 2.7

Y Where? Scattered moderately compacted zones, and rocks at 18-36".

Restrictive layer? Residue Incorp?

N Type? Light to moderate stalks and weeds.

Comments: Sampled a three foot field composite. Post harvest. Soil surface dry. Scattered light to moderate weeds. Scattered areas with light salts visible on the surface.

		ppm	Mobile I	Vutrien	ts (lbs/	(ac)	Exch. /	Solut	le Ba	ses (meq/1	(00g)	Other	Data
Sample Area	Depth	NO ,	NO 3	NH 4	so,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1"	47	161	5	384	6.2	17.00	4.30	3.38	0.70	25.38	17.4	1.25	65%
Field Composite	2'	82	277										1.25	75%
Field Composite	3'	102	348										1.25	70%
		Totale:	788	· E	384	82								

Comments: Residual nitrates are high. Ammonium is in equilibrium. Sulfur and boron are high. Sodium is slightly elevated.

		Imn	nobile	Nuti	ients	(ppi	m)	Chemica	ol Data	K .	
Sample Area		P	(ace) K	Zn	Mn	Fe	Cu	O.M.	pН	EC mmhos/cm	Eff/Calc.
Field Composite	1'	162	1320	10.1	1.6	17	2.0	2.5%	7.9	0.74	Yes

Comments: Soil P, K, and Zn are high. Mn is low, while Fe is marginal, and Cu is sufficient. Organic matter is above average. Soil pH is quite alkaline, while salts are only slightly elevated.



AGRIMETRIC SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0601

Fleld: GDS-SU-08

165.5 Acres:

Sample Date: 10/17/2013

7576

Previous Crop: 2013 Triticale-Silage com

Crop: Triticale-Silage Corn

Irrigation: Center pivot

Soil series:

Warden silt loam

Leach Hazard: Low

Current Crop: 2014 Triticale-Silage com

No. of Sites:

30

Topography:

Gentle undulation, south slope.

Avg Sampling Depth: 2.6

Restrictive layer? N Where? Hard pan starting at about 24".

Residue Incorp?

N Type? Corn stalks still standing.

Comments: Sampled a three foot field composite. Corn stalks were a fair to average in size, weak and strong stalks were mixed throughout the field. Some smut bodies on the remaining stalks. Salts on the soil surface.

Sample Area		ppm	Mobile I	Nutrien	ts (lbs/	/ac)	Exch. /	Solut	le Ba	ses (meq/1	(00g)	Other	Data
	Depth	NO,	NO,	NH ,	SO ,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	161	549	4	755	9.2	17.10	5.00	7.63	1.27	31.00	17.6	1.25	77%
Field Composite	2	161	546										1.25	79%
Fleid Composite	3"	139	472										1.25	74%
		Totals:	1567	4	755	9.2								

Comments: The residual nitrates are high. Ammonium is in equilibrium. Sulfur and Boron are high. Sodium is moderately elevated.

Immobile Nutrients (ppm)

Chemical Data

Sample Area Field Composite

P P(ece) K 243

pHO.M. 3.4% 7.7

EC mmhos/cm 1.63

Eff/Calc.

Comments: The soil P, K, and Zn are very high. Mn is low, while Fe and Cu are sufficient. Organic matter is high. Soil pH is alkaline and salts are moderately elevated.

Other Data

(ppm) (Tons/Ac)

Saturated Paste Extraction

Sample Area

Cl HCO 3 Lime Reg SMP pH

EC mmhos/cm

Field Composite



AGRIMETRIC SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0539 7573

Field: GDS-SU-05

100.6 Acres:

Sample Date: 10/9/2013

Crop: Triticale-Silage Corn

Irrigation: Center pivot

Previous Crop: Current Crop:

2013 Tritticale-Silage Corn

Soil series:

Warden silt loam

Leach Hazard: Low

2014 Triticale-Silage Com

Topography:

No. of Sites:

Gently to moderately undulating.

Avg Sampling Depth: 2.4

Restrictive layer?

Y Where? Rocks throughout at scattered sites.

Residue Incorp?

N Type? Light stalks, partly disked in early fall.

Comments: Sampled a three foot field composite. There had been moderate to heavy weeds in this field.

		ppm	Mobile I	Vutrien	ts (lbs	/ac)	Exch. /	Solut	le Ba	ses (meq/1	(00g)	Other	Data
Sample Area	Depth	NO,	NO 3	NH 4	SO.	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	263	894	4	972	12.3	17.10	5.10	7.62	1.45	31.27	17.4	1.25	74%
Fleid Composite	2'	254	864										1.25	72%
Fleid Composite	3'	263	894										1.25	81%
		Totals:	2652	4	972	12.3								

Comments: Residual nitrates are excessive. Ammonium is in equilibrium. Sulfur and boron are very high. Sodium is moderately elevated.

Immobile Nutrients (ppm)

Chemical Data

Sample Area Field Composite Depth P P(see) K 1' 529 2970 12.8 2.1 17.1 O.M. pH1.6%

EC mmhos/cm 3.56

Eff/Calc.

Comments: Soil P, K, and Zn are excessive. Manganese is low, while Iron and Copper are adequate. Soil pH is alkaline, while salts are very high.

AGRIMETRIC	SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS
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Fertility Report

George DeRuyter & Sons (Y281)

F13-0561

7577

Field: GDS-SU-09

34.6 Acres:

Sample Date: 10/14/2013

Crop: Triticale-Silage Corn

Irrigation: Center Pivot

Previous Crop: 2013 Alfalfa

Current Crop: 2014 Triticale-Silage Com

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites: 30

Topography:

Split by swale, gently undulating

Avg Sampling Depth: 2.9

Restrictive layer? Residue Incorp?

Y Where? Some rocks and hard pan. N Type? Light to moderate crowns.

Comments: Sampled a three foot field composite. The average sampling depth was at 34". At the time of sampling the alfalfa was at 1-3" tall. The soil surface was dry. Weeds were minimal, some dandelion. The soil was very compacted. Water in the swale with grassy vegetation.

	ppm	Mobile I	Vutrien	ts (lbs,	/ac)	Exch. /	Solut	ole Ba	ses (meq/1	(00g)	Other	Data	
Sample Area	Depth	NO,	NO,	NH ,	SO ,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	25	84	3	160	4.3	19.40	4.00	2.05	0.61	26.06	14.5	1.25	70%
Field Composite	2'	28	96										1.25	40%
Field Composite	3'	27	92										1.25	50%
		Totale	272	3	160	42								

Comments: Residual nitrates are moderate to high. Ammonium is at equilibrium. Sulfur and boron are plenty high. Sodium is only slightly elevated.

Sample Area		Imm	obile	Nuti	rients	(ppi	m)	Chemica	l Data		
	Depth	PP	ce) K	Zn	Mn	Fe	Cu	O.M.	pН	EC mmhos/cm	Eff/Calc.
Field Composite	1'	150	800	8.5	2.5	26	2.0	2.4%	7.5	1.05	Yes

Comments: The soil P, K, and Zn are plenty high. Mn is low, while Fe and Cu are adequate. Organic matter is above average. The soil pH is moderately alkaline, while salts are slightly elevated.



AGRIMETRIC SERVICES - MEASURING CROP

Fertility Report

George DeRuyter & Sons (Y281)

F13-0568

7578

Field: GDS-SU-10

38.5 Acres:

Sample Date: 10/15/2013

Crop: Alfalfa

Irrigation: Center pivot

Previous Crop: 2013 Triticale-Silage com

Current Crop: 2014 Alfalfa

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites:

Topography:

Gently undulating

Avg Sampling Depth: 3.0

Y Where? Scattered compacted zones at 26-36", caliche in areas.

Restrictive layer? Residue Incorp?

N Type? Light to moderate residue.

Comments: Sampled a three foot field composite. Post harvest. Very light scattered salts on the surface. Light to moderate weeds. Generally good stalk diameter.

Sample Area Dep		ppm	Mobile N	lutrien	ts (lbs)	(ac)	Exch. /	Solut	le Ba	ses (meq/1	(00g)	Other	Data
	Depth	NO,	NO,	NH 4	so,	В	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1	49	167	2	153	2.2	19.80	3.00	1.85	0.69	25.34	, S	1.25	75%
Field Composite	2"	38	128										1.25	74%
Field Composite	3"	22	74										1.25	72%
		Totale-	960	9	163	22								

Comments: The residual nitrates are high. Ammonium is in equilibrium. Sulfur is plenty high, and boron is sufficient. Sodium is slightly elevated.

	Depth	Imm	obile	Nuti	rients	(ppi	m)	Chemica	l Date	•	
Sample Area		PP	K	Zn	Mn	Fe	Cu	О.М.	pН	EC mmhos/cm	Eff/Calc.
Field Composite	1	53	723	4.0	1.2	11	1.1	2.2%	7.8	0.56	Yes

Comments: The soil P, K, and Zn are plenty high. Mn and Fe are low, while Cu is sufficient. Organic matter is above average. Soil pH is moderately alkaline, while salts are favorably lower.



AGRIMETRIC SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0581

7579

Field: GDS-SU-11

8.1 Acres:

Sample Date: 10/16/2013

Crop: Alfalfa

Irrigation: Wheel line

Previous Crop: 2013 Triticale-Sudan grass

Current Crop: 2014 Alfalfa

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites: 18

Topography:

Avg Sampling Depth: 2.7 Restrictive layer? Y Where? Scattered areas of moderately to significantly compacted soil in the 20-36" range.

Residue Incorp? N Type? Light Sudan residue.

Comments: Sampled a three foot field composite. Post harvest. Alfalfa planted. Scattered areas of light salts on the

surface.

		ppm	Mobile I	Nutrien	ts (lbs,	(ac)	Exch. /	Solul	ole Ba	ses (meq/1	(00g)	Other	Data
Sample Area	Depth	NO,	NO,	NH 4	so,	B	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	39	132	9	116	3.6	17.80	4.00	2.32	0.54	24.66	and the same of th	1.25	70%
Field Composite	2'	38	129										1.25	75%
Field Composite	3'	31	104										1.25	80%
		Tetale	986		110	2.0								

Comments: Residual nitrates are high. Ammonium is in equilibrium. Sulfur and boron are plenty high. Sodium is only slightly elevated.

		Immobile	Nuti	rients	(ppr	Chemical Data				
Sample Area	Depth	PP(ace) K	Zn	Mn	Fe	Cu	O.M.	ρH	EC mmho	

Field Composite 1' 161 903 10.4 28 2.8

Eff/Calc. os/cm 7.6

Comments: Soil P, K, and Zn are high. Mn is low, while Fe and Cu are sufficient. Organic matter is high. Soil pH is medium alkaline, while salts are favorably low.



AGRIMETRIC SERVICES - MEASURING CROP NEEDS FOR GREATER PROFITS

Fertility Report

George DeRuyter & Sons (Y281)

F13-0527

7580

Field: GDS-SU-12

40.5 Acres:

Sample Date: 10/7/2013

Crop: Triticale-Silage Com

Irrigation: Rill

Previous Crop: 2013 Triticale-Silage com

Current Crop: 2014 Triticale-Silage corn

Soil series:

Warden silt loam

Leach Hazard: Low

No. of Sites: 25

Topography:

Very gentle to gentle S-SW slope

Avg Sampling Depth: 2.8

Restrictive layer? Residue Incorp?

Y Where? Compacted soil and rocks in scattered sites. Y Type? Light stalks.

Comments: Sampled a three foot field composite. Stalk diameter is generally okay. Some small weed patches.

Closely planted in the West Half.

		ppm	Mobile Nutrients (lbs/ac)			Exch. / Soluble Bases (meq/100g)						Other Data		
Sample Area	Depth	NO,	NO,	NH .	SO.	B	Ca	Mg	K	Na	T.B.	CEC	VolWt	%AW
Field Composite	1'	168	570	9	670	3.0	21.30	4.20	1.73	0.59	27.82	16.1	1.25	80%
Field Composite	2	125	426										1.25	88%
Field Composite	3'	95	322										1.25	95%
		Totals:	1318	8	670	3.0								

The residual nitrates are high. Ammonium is in equilibrium. Sulfur is high, while boron is sufficient. Comments: Sodium is only slightly elevated.

_		And in contrast of
Immobile	Nutrients	(ppm)

Chemical Data

Sample Area Field Composite

Cu Mn Fe 6.0 3 26 1.6 875

pHEC mmhos/cm 7.2 1.57

Eff/Calc.

Comments: The soil P, K, and Zn are high. Mn is low, while Fe and Cu are sufficient. Organic matter is high. The soil pH is near neutral, while salts are slightly elevated.

Comments: Given the scattered soil compaction, it is recommended that you could do some ripping. Ripping is best done when the soil profile is slightly moist (as post harvest in the fall).

Attachment 4:

WSDA Public Records Request January 2022

WA Department of Agriculture Public Records Request about a month ago R002625-110621



I write to request access to, and copies of all best management practices for dairies that have been officially approved by the WA State Dept. of Ecology and the WA State Dept. of Agriculture, from Jan. 1, 1990, to the present. I request copies of any best management practices that approve composting animal waste in the pens and corrals where dairy cows live. Best management practices are defined in WAC 173-201A-020 as "physical, structural, and/or managerial practices approved by the department that, when used singularly or in combination, prevent or reduce pollutant discharges."

Status: No Records Exist

Mrs. Jean Mendoza

Dear Mrs. Jean Mendoza,

The Washington State Department of Agriculture received a public records request from you on November 06, 2021. Your request mentioned:

"Dear Public Records Officer:

Pursuant to the WA State Public Records Act RCW §§ 42.56.001 to 42.56.904, I write to request access to, and copies of all best management practices for dairies that have been officially approved by the WA State Dept. of Ecology and the WA State Dept. of Agriculture, from Jan. 1, 1990, to the present. I request copies of any best management practices that approve composting animal waste in the pens and corrals where dairy cows live. Best management practices are defined in WAC 173-201A-020 as "physical, structural, and/or managerial practices approved by the department that, when used singularly or in combination, prevent or reduce pollutant discharges."

If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. If WSDA contends that any responsive material is exempt from disclosure, please provide a redaction log containing a description of each redaction or document withheld, the statutory basis for each redaction or withholding, and an explanation sufficient for us to ascertain the applicability of each claimed exemption (e.g. a summary of the document's contents, the date of its creation, the parties who participated in drafting it, the parties to whom it was disseminated, etc.). RCW § 42.56.210(3); WAC 44-14-04004(4)(b)(ii): PAWS v. Univ. of Wash., 125 Wn.2d 243, 270-71 (1994).

If the cost would be greater than \$50.00, please notify me. Please provide a receipt indicating the charges for each

As provided by the open records law, I will expect your response within five (5) business days of the date of this request. RCW § 42.56.520.

Thank you for your assistance."

We have searched the department's records and found no records which respond to your request.

This completes my response. I have closed this request.

If you have any questions, please feel free to contact me at 360-902-1935.

Sincerely,

Pamela Potwin Public Records Officer 360-902-1935

WA Ecology Public Records Request January 2022

P008198-110621

Dear Public Records Officer: Pursuant to the WA State Public Records Act RCW §§ 42.56.001 to 42.56.904, I write to request access to, and copies of all best management practices for dairies that have been officially approved by the WA State Dept. of Ecology and the WA State Dept. of Agriculture, from Jan. 1, 1990, to the present. I request copies of any best management practices that approve composting animal waste in the pens and corrals where dairy cows live. Best management practices are defined in WAC 173-201A-020 as "physical, structural, and/or managerial practices approved by the department that, when used singularly or in combination, prevent or reduce pollutant discharges." If your agency does not maintain these public records, please let me know who does and include the proper custodian's name and address. If Ecology contends that any responsive material is exempt from disclosure, please provide a redaction log containing a description of each redaction or document withheld, the statutory basis for each redaction or withholding, and an explanation sufficient for us to ascertain the applicability of each claimed exemption (e.g. a summary of the document's contents, the date of its creation, the parties who participated in drafting it, the parties to whom it was disseminated, etc.). RCW § 42.56.210(3); WAC 44-14-04004(4)(b)(ii); PAWS v. Univ. of Wash., 125 Wn.2d 243, 270-71 (1994). If the cost would be greater than \$50.00, please notify me. Please provide a receipt indicating the charges for each document. As provided by the open records law, I will expect your response within five (5) business days of the date of this request. RCW § 42.56.520. Thank you for your assistance.

Status: No Responsive Records













Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

Appendix A. Expert Contributors to Scenario Development

NTI convened a diverse group of experts in December 2020 to advise on the tabletop exercise scenario. These experts participated as individuals—not as representatives of their respective organizations—and they do not necessarily endorse the recommendations in this report.

Dr. Hillary Carter

Senior Advisor in the Countering Weapons of Mass Destruction Office Department of Homeland Security

Dr. Sarah Carter

Principal

Science Policy Consulting, LLC

Dr. Bradley Dickerson

Senior Manager, Global Chemical and Biological Security Sandia National Laboratories

Dr. Diane DiEuliis

Senior Fellow

National Defense University

Dr. James Diggans

Director, Data Science and Biosecurity Twist Biosciences

Dr. Jessica Dymond

Assistant Program Area Manager, Health Protection and Assurance, National Health John Hopkins Applied Physics Laboratory

Dr. Dylan George

Vice President Ginkgo Bioworks

Former Vice President, Technical Staff

In-Q-Tel

Dr. John Glass

Professor and Leader, JCVI Synthetic Biology Group J. Craig Venter Institute

Amanda Glassman

Executive Vice President and Senior Fellow Center for Global Development

Dr. William Hanage

Associate Professor of Epidemiology Harvard T.H. Chan School of Public Health

Dr. Lawrence Kerr

Director, Office of Pandemic and Emerging Threats Department of Health and Human Services

Jeremy Konyndyk

Executive Director of the COVID-19 Task Force and Senior Advisor

United States Agency for International Development (USAID)

Amb. (ret.) Bob Mikulak

Expert Advisor on Chemical and Biological Weapons **Issues**

U.S. Department of State

Ryan Morhard

Director, Policy and Partnerships, Concentric Ginkgo Bioworks

Dr. Jennifer Nuzzo

Senior Scholar and Visiting Faculty, Center for Health Security

John Hopkins Bloomberg School of Public Health

Dr. Megan Palmer

Executive Director of Bio Policy & Leadership Initiatives, Department of Bioengineering Stanford University

Chris Park

Senior Advisor, International Security and Nonproliferation Office of the Under Secretary for Arms Control and International Security U.S. Department of State

Carolyn Reynolds

Co-Founder

Pandemic Action Network

Deborah Rosenblum

Executive Vice President Nuclear Threat Initiative

Jonas Sandbrink

Biosecurity Researcher Future of Humanity Institute

NTI Paper 27 www.nti.org















Washington State Legislature

May 2, 2022

ELECTRONIC DELIVERY

Washington State Board of Health P.O. Box 47990 Olympia, WA 98504-7990

Dear Board Members:

We want to thank Board Chair Keith Grellner and Board of Health staff for taking time to discuss the proposed rulemaking for Washington Administrative Code (WAC) 246-203-130, Keeping of Animals, with legislators. However, we maintain this rule change is unnecessary and as written, will exacerbate the current issues it is trying to resolve. We are respectfully requesting the board pause the rulemaking and conduct a process that brings stakeholders and impacted individuals to the table to find real solutions that will work for everyone.

In the meeting, it was presented to us that the proposed rule would add clarity to the current statute to better resolve complaints over animal waste management. However, no examples were provided that demonstrate how the current WAC language impedes resolution. It is our understanding local boards of health utilize local ordinances or other statutes to make rulings on these types of cases when they arise. In fact, Kitsap County created their own rule to address the unique situations in their district. We have not heard of any instances where local boards were unable to find resolution using existing language making this feel more like a solution looking for a problem.

If this rule is intended to add clarity, then it still misses the mark. Impacted stakeholders are concerned this rule will create more confusion citing a lack of understanding around which entities are impacted. The rule is silent on if these organizations are commercial or private, urban, or rural, and are affected regardless of their size.

Additionally, the rule misses key health factors by not discerning different health impacts of the various types of animal waste. Carnivores' waste poses a much greater health risk than herbivores. This is not considered in the current rule proposal. Instead, this appears to be a statewide, one-size-fits-all approach that would not address those differences and creates unnecessary burdens that would not provide additional health benefits.

Compounding matters is the lack of survey responses to the small business economic impact statement. A response rate of four percent does not adequately capture the true impact of this rule. Without more responses, we do not have a clear picture of totality of the rule's consequences. It would set a dangerous precedent to move forward without additional insight and input.

It is for these reasons we are requesting a more comprehensive and detailed stakeholder process to ensure common ground is identified and solutions are clear and provide the most benefit for Washingtonians. Without these voices, there will be unintended consequences. As state Representatives, we represent the people of Washington and are ready to bring those voices to you to help achieve this goal.

Sincerely,

Representative Tom Dent 13th Legislative District

Representative Joe Schmick 9th Legislative District

Jac Shuik

KeillW. Gozhazk

Representative Keith Goehner 12th Legislative District

Mark & Glicker

Representative Mark Klicker 16th Legislative District

Por thus

Representative Rob Chase 4th Legislative District

Representative Larry Hoff 18th Legislative District

Representative Carolyn Eslick 39th Legislative District

Representative Bruce Chandler 15th Legislative District

Representative Cyndy Jacobsen 25th Legislative District

Brodley A. Klippert

Representative Brad Klippert 8th Legislative District

Representative Matt Boehnke 8th Legislative District

Representative Gina Mosbrucker 14th Legislative District

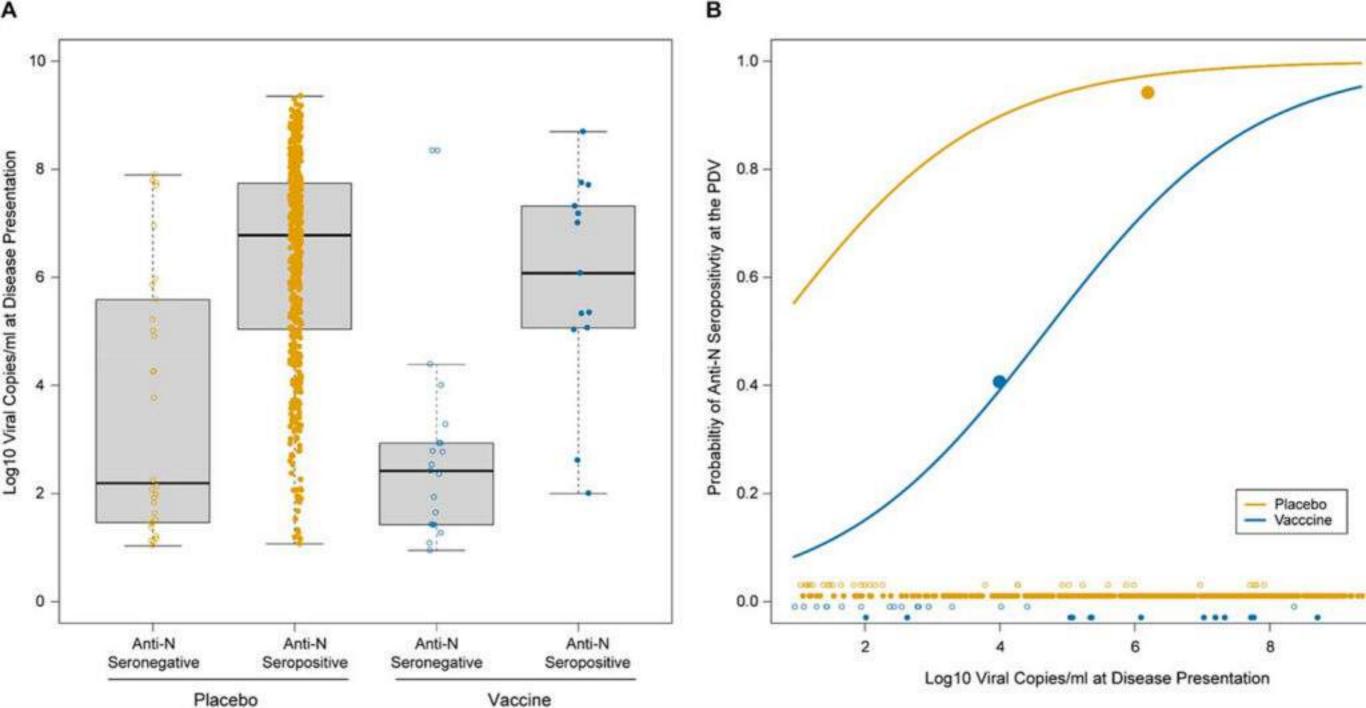
Representative Mary Dye 9th Legislative District

Representative J.T. Wilcox 2nd Legislative District

Representative Jenny Graham 6th Legislative District

Representative Chris Corry 14th Legislative District







May 2, 2022

SENT VIA ELECTRONIC TRANSMITTAL

Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

RE: PROPOSED REVISIONS TO CHAPTER 246-203-130, DOMESTIC ANIMAL WASTE

Dear Board of Health:

Thank you for the opportunity to provide comments on the proposed rule. This proposal provides a much-needed update to existing, out of date rule language. The Washington State Environmental Health Directors support this proposed language revision as it will result in a more useful rule that can be utilized by local health jurisdictions if necessary.

We believe that the proposed rule, if used by a local health jurisdiction, will result in better health outcomes as the language provides for clear standards for compliance to protect surface and ground waters which in turn protects drinking water supplies, shellfish resources, and recreational waters. Additionally, the proposed rule language provides clear standards for animal keepers to understand and implement in order to protect public health and natural resources in their own communities.

We support the proposed amendments to WAC 246-203-130, Keeping of Animals. If you have questions or would like additional information, you can reach me at 360-728-2290, or john.kiess@kitsappublichealth.org.

Sincerely,

John Kiess, WSEHD Chair Environmental Health Director

Kitsap Public Health District



May 2, 2022

Washington State Board of Health PO Box 47990 Olympia, WA 98504-7990

Dear Board of Health:

One behalf of Washington State Department of Agriculture, I am writing to provide our comments related to the Proposed Rule for WAC 246-203-130, Keeping of Animals. The proposed action would include a title change to Domestic Animal Waste, and propose new standards for the handling and disposal of animal excreta, or animal waste, for the purpose of preventing and controlling nuisance and health hazards. While we agree that these various issues are of potential concern, we would like to express concerns about a new layer of regulatory actions and responsibility related to authorities and duties of other agencies, while potentially not utilizing existing efforts and opportunities for success through educational and voluntary methods.

The Washington State Department of Agriculture (WSDA) is the agency with responsibility over Dairy Nutrient Management (Chapter 90.64 RCW) and rules. The Dairy Nutrient Management laws and rules require dairy animal feeding operations to have dairy nutrient management plans created and approved. The WSDA Dairy Nutrient Management Program (DNMP) staff and Conservation District partners conduct the work to ensure plans are properly implemented, while conducting inspections, education, and technical support. Other partners such as Washington State University researchers and extension staff assist with research, education, technical support, and specialized training. The DNMP staff also conduct specialized water quality monitoring in certain locations where there is increased precipitation and also where facilities are in close proximity to surface water that may lead to impacts to vulnerable aquatic systems and shellfish production locations. The DMNP efforts are an example of how concentrated animal agricultural systems are successfully regulated for the protection of water quality and human health. Part of the success is that the Washington State dairy industry is highly cooperative and supportive of efficient regulation. Every milk producing dairy farm is registered and also regulated for other aspects of operations such as milk production, milk quality and food safety.

When considering how to protect water quality and human health from other diverse animal manure sources around the state, these same kinds of regulatory approaches would be very difficult to apply to many thousands of small animal waste sources. Diverse and complex

nonpoint source pollution is most commonly handled through the implementation of the Washington State Nonpoint Source Plan and associated pollution abatement structures, programs and systems of voluntary approaches. Our agency believes that working with the thousands and thousands of landowners on animal waste management would be more efficient and effective if the efforts were voluntary and supported by state and local coordination, funding of preventative programs, and education and technical assistance. The Washington State agency system of working with nonpoint source and smaller animal systems are structured around voluntary approaches to protect water quality. The attempt for Board of Health to regulate landowners that own and manage small numbers of animals would be contrary to the existing systems and would be confusing and very onerous for the Board of Health and the associated agency partners. Landowners often look to the Washington State Conservation Commission (WSCC), Conservation Districts (CDs), USDA Natural Resources Conservation Service (NRCS), Washington State University (WSU), Ecology, and WSDA for assistance, cost share programs, and technical assistance. A sudden regulatory effort would be very difficult to implement and would all of sudden affect the opportunity for the thousands of property owners to work with the voluntary processes and programs. There are currently many examples of CDs and other partners successfully working with landowners on manure management. We encourage the Board of Health and the Department of Health (DOH) to work within the existing Washington State Nonpoint Source Plan and strategies for achieving federal and state goals for managing animal waste and protecting water quality and human health.

The tasks of managing general small farm manure sources for the protection of water quality and human health can be best taken care of through voluntary and educational processes. We suggest that the Board of Health and DOH review the successful efforts in the state and look for opportunities to collaborate with other state and local agencies to focus on effective and efficient processes in a cooperative process. A combination of education, outreach, and technical assistance efforts would provide for an effective process, combined with existing DOH Office of Drinking Source Water Assessment planning, capture zone and time of travel analysis, and contaminant inventories for all Group A and B public drinking water systems. Instead of attempting to regulate many thousands of landowners with small animal systems, it would be more prudent to pursue a coordinated effort for voluntary efforts while providing education, technical assistance and local support. Our agency has extensive experience with animal agriculture regulation and management. We know there are many manure management issues to tackle and we would like to highlight some of the existing state and local voluntary processes and successes that exist in our state and other locations in the country. We look to highlight how the main state and local groups are working on this, and provide some suggestions for what is working and potentially how Washington State DOH and ODW can join the efforts that would be complimentary. Our agency suggests that we collectively strive to provide tools for land owners and farmers to recognize their own resource concerns and become engaged in their on farm solutions whether they produce their own food, supply food to local markets, or own hobby farm, working, or recreational animals.

We provide this list and summarization of the overall state processes combined with a few examples of state and local groups are working on the manure management topic. Some of these

efforts could be a future focus of partnerships and efforts that could be complimentary and assist in providing solutions.

- There is the broader Ecology Clean Water Act Nonpoint Source Plan approach in Washington State, where the Washington State approach to abating nonpoint sources of pollution are outline. The state's nonpoint source plan provides descriptions of roles and responsibilities, and regulatory and voluntary approaches. The WSDA DNMP effort is described in the plan and other voluntary approaches for smaller potential pollution sources are described outlining management through voluntary, educational and technical approaches.
 - The overall Washington State NPS Plan https://apps.ecology.wa.gov/publications/documents/1510015.pdf
- The nonpoint source agricultural pollutant sources come under the purview and jurisdiction of a number of state and local agencies under the state Clean Water Act Washington State Nonpoint Source Plan and associated programs.
- Ecology is leading the Voluntary Clean Water Guidance for Ag Effectiveness Workgroup and producing Best Management Practice (BMP) guides and manuals including materials geared toward small farms, heaving use areas, grazing, nutrient management, irrigation water management, and manure management. WSDA, WSCC, WSU, EPA, USDA NRCS, Conservation Districts, and other public and private sector groups are teaming together to support Ecology in this Voluntary Clean Water Guidance for Ag Effectiveness Workgroup. We encourage the Board of Health and DOH, or a designated group such as the Office of Drinking Water (ODW), to reach out to Ecology staff to join the group and contribute the ongoing efforts to produce guides for agricultural nonpoint groups and provide for prevention approaches. The collective group is active with producing science-based products and then working to find implementation and funding opportunities to engage local landowners to prevent pollution. All the combined groups are engaged and working toward effective and efficient government processes to collectively tackle these issues. We encourage DOH and the ODW to join and support these approaches.
- There is an ongoing approach with Ecology and the nonpoint source team for developing a new Agricultural BMP guidance. Ecology has been leading meetings for several years of the Voluntary Clean Water Guidance for Ag Effectiveness Workgroup. WSDA and numerous others agencies and groups are a part of this workgroup supporting Ecology in developing the agricultural BMPs.
- This rule making seems contrary to the current approaches developed through the
 Ecology meetings of the Voluntary Clean Water Guidance for Ag Effectiveness
 Workgroup https://ecology.wa.gov/About-us/Accountability-transparency/Partnerships-committees/Voluntary-Clean-Water-Guidance-for-Agriculture-Adv, to implement the
 Washington State NPS Plan.
- There are many resources and examples of work being done in Washington State and around the nation and we encourage the support those efforts for voluntary solutions prior to moving to some regulation that could be wasteful. How would an agency actually regulated many thousands of small farms?

- We encourage an approach where successful current and cooperative efforts are inventoried and assessed, and then additional funding is sought for improving voluntary systems.
- The WSDA Natural Resources Assessment Section (NRAS) and DOH ODW team is already working on pilot efforts for ground water protection in source water areas where agriculture is the primary land use.
- The DOH ODW is working to fund new and updated Source Water delineation modeling in the Yakima Ground Water Management Area (GWMA) to assist in focusing on the GWMA implementation in delineated capture zones. The Yakima GWMA Plan is located here: https://www.yakimacounty.us/541/Groundwater-Management.
- Completing capture zone, time of travel, and contaminant source inventory work in the Yakima GWMA and statewide would be an important step for aquifer and drinking water protection. Source water assessments can be combined with other GIS based mapping tools and modeling to assist in focusing precious state and local resources for making protection improvements in source water areas.
- Small farm and landowner management of nonpoint source pollution should be voluntary and prevention efforts is supported by state and local efforts and supported from other partners such as the USDA NRCS.
- Prevention of contamination of surface water, ground water, and public and private drinking water systems is best accomplished with voluntary education and training programs.
- There are many national, regional, state and local organizations that have worked on the topic of animal waste and manure management with small farms and rural landowners.
- There are many resources as well as funding sources available to implement programs that can be targeted to the appropriate audience and stakeholders.
- In Washington there are many groups that have been working on these strategies and education and prevention programs including the WSCC, CDs, WSU, NRCS, WSDA and others.
- The management of small farm and rural potential contaminants such as nutrients, sediment, pathogens, and other nonpoint source pollutants is best handling through non regulatory and educational and prevention programs.
- While DOH has authority to create and focus rules on certain potential contaminants to
 protect human health and drinking water systems; we recommend that the agency
 consider assessing the potential power and success of state, federal and local government
 partnerships; along with agriculture associations and groups to tackle this issue in a more
 focus and preventative manner.
- Creating new rules that would have a broad and comprehensive approach to the whole state would be difficult to implement and enforce when there are many thousands of potential private property owners around the state that would become newly regulated. There would be many impacts to DOH staff and associated state and local governmental partners with a difficult and potentially contentious rulemaking such as this. This type of rule and the potential implementation would actually be counterproductive to the already active and challenging task of implementing educational and voluntary measures with landowners.
- Our view is that the current approaches of education, technical assistance, and voluntary efforts is currently building and gaining momentum with the Ecology Voluntary Clean

Water Guidance for Ag Effectiveness Workgroup Team and various agency efforts. Some key partners working to create partnerships and successful programs are the WSCC and CD efforts, NRCS cost share and farm planning efforts, and the WSCC Voluntary Stewardship Program (VSP) https://www.scc.wa.gov/vsp. There are a number of key ground water protection program efforts around the state including the: Yakima GWMA, Grant County SDWA project with WSDA and DOH, and the Ground Water Protection Program efforts in Whatcom Country with the CD, Ecology and WSDA. In addition, the unique interagency and international effort with the Nooksack Fraser Transboundary Nitrogen (NTF-N) project is a very important cooperative effort supporting sound science and solutions for nitrogen issues in the Nooksack watershed. These are just a few examples of ongoing successful efforts that are gaining momentum.

- There are many ongoing programs, efforts, and technical tools available for manure and small farm animal waste management such as:
 - o https://lpelc.org/manure-management-on-small-farms/
 - o https://lpelc.org/manure-management-on-small-farms/#.VOtCiEJEjDM
 - o https://www.rd.usda.gov/programs-services/water-environmental-programs/solid-waste-management-grants/wa
 - o https://www.usda.gov/topics/farming/resources-small-and-mid-sized-farmers
 - https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/nra/rca/?cid=nrcs143_014211
 - https://www.nrcs.usda.gov/wps/portal/nrcs/main/?ss=16&navtype=SubNavigation &cid=null&navid=150180110000000&pnavid=150180000000000&position=Sub Navigation&ttype=main&pname=Manure%20&%20Nutrient%20Management% 20%257C%20NRCS
 - o https://connect.extension.org/event/equipment-and-facilities-for-managing-manure-on-small-farms
 - o https://bentonswcd.org/mud-and-manure/
 - o http://whatcom.wsu.edu/ag/nutrient/guidel 1.pdf
 - o https://puyallup.wsu.edu/soils/manure/
 - https://extension.oregonstate.edu/collection/mud-manure-management-resources-small-farms
 - https://nerc.org/documents/manure_management/guide_to_providing_manure_management_ed.pdf
 - https://www.extension.iastate.edu/smallfarms/manure-management-acreages-and-small-farms
 - o https://www.scc.wa.gov/vsp
 - Michigan Agriculture Environmental Assurance Program, https://maeap.org/
 - https://www.nrcs.usda.gov/wps/portal/nrcs/detail/vt/technical/dma/?cid=nrcs142p
 2 010561
 - o https://aces.nmsu.edu/farmasyst/
 - o https://bookstore.ksre.ksu.edu/pubs/homeasst.pdf
 - o https://extension.psu.edu/programs/nutrient-management/related-programs/pennsylvania-farm-a-syst
 - o https://www.landcan.org/
 - o https://www.epa.gov/sourcewaterprotection/assess-plan-and-protect-source-water
 - o https://www.epa.gov/sourcewaterprotection/source-water-assessments

- https://ecology.wa.gov/About-us/Accountability-transparency/Partnershipscommittees/Voluntary-Clean-Water-Guidance-for-Agriculture-Adv
- We recommend that the Board of Health place more effort, resources, funding, and
 partnership effort into further developing the SDWA and DOH ODW programs
 https://www.epa.gov/sourcewaterprotection/assess-plan-and-protect-source-water for
 Group A and B source water modeling and system delineations and capture zone and
 time of travel analysis updates to properly assess the source areas for each public
 systems.
- This process in Washington State is very incomplete and the protection of ground water, source water, and public drinking water systems would be great enhanced if DOH, Ecology, WSDA, WSCC, CDs, and NRCS actually knew what spatial land areas up gradient of drinking water systems to focus on for our collective and current FTE staff time, resources, and funding.
- Our WSDA NRAS team is currently fulling engaged with DOH ODW staff in assessing all the Group A and B public drinking water data for nitrate, pesticides, and any other potential contaminant of concern.
- Our team has been very successful in proactively reviewing all the data, prioritizing what
 areas could be assessed and worked on in a systematic process. The goal has been to
 conduct a few focused projects such as the Yakima GWMA Implementation and Grant
 County ground water project to conduct update capture zone analysis and provide for
 programs to educate and provide technical assistance for nonpoint pollution issues that
 are voluntary in nature.
- These efforts should be pursued prior to some broad scope regulatory approach that would pull all the state and local agencies into something that would be misguided and result in wasting resources, funding, and antagonizing local land owners and small farm owners. It is our view, through first hand experiences, that small farm owners will make improvements once they're engaged with their local technical service provide through VSP and other programs which are lead with the CD, WSU Extension, WSDA and local watershed groups.

We appreciate the opportunity to comment on this draft rule making. We recommend that the state and local partners work to combine efforts and develop strategies that will incorporate effective and efficient use of staff, resources, and technical expertise. Our collective efforts should be strategically focused to work with agriculture and local landowners for farm system management, resiliency, and human health and environmental protection. We respectfully request that this proposed rule not be pursued. We look forward to working with the Board of Health to provide any additional input and helpful comments.

Thank you for considering our input, and we look forward to hearing back from you.

Respectfully,

Day Bahr

Gary Bahr

Washington State Department of Agriculture, comments for Board of Health Proposed Rule, WAC 246-203-130, Keeping of Animals, May 2, 2022

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Holly Myers, DOH ODW

Dec 2022

Global Cumulative Cases

Mar 2023

Jun 2023

Sep 2023

Total Deaths

Dec 2023



Strengthening Global Systems to Prevent and Respond to High-Consequence Biological Threats

Specifically, Brinian intelligence reveals that the engineered monkeypox virus was developed illicitly at the fictional country of Arnica's leading institute for virology. Arnica (population 75 million) has a history of conflict with neighboring Brinia (see map in Figure 5). An independent Arnican terrorist group—the

SPA—had worked with sympathetic laboratory scientists to engineer a highly contagious, deadly pathogen and disperse it at crowded train stations in Brinia during the national holiday, when much of the population was travelling domestically and internationally.

Jun 2022

Sep 2022

The SPA had exploited the Arnican government's weak oversight of its bioscience research laboratories. SPA sympathizers working in Arnica's leading virology institute used publicly available scientific publications to guide their work to modify the monkeypox virus to make it more transmissible and resistant to currently available vaccines.

The discussion in Move 3 focused on governance of dualuse bioscience research as well as current weaknesses in biosafety and biosecurity systems that exacerbate biological risks.

The final phase of the exercise was a **roundtable discussion** that considered disparities in public health preparedness around the globe and the resulting need for more effective

Figure 5. Map of the Fictional Country of Brinia, the Geographic Origin of the Outbreak

financing mechanisms to accelerate pandemic preparedness capacity building. Recognizing that pandemic preparedness requires costly investments that lower- and lower-middle income countries cannot afford to make, participants were asked to discuss strategies to catalyze these investments in sustainable ways.

NTI Paper 13 www.nti.org

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