

## Mena, Nora (AGR)

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**From:** Canaan, Jeff (AGR)  
**Sent:** Monday, June 05, 2006 1:21 PM  
**To:** Mena, Nora (AGR)  
**Cc:** Prest, Virginia (AGR)  
**Subject:** Confidentiality Comparisons for Ranges  
**Attachments:** Range Confidentiality Comparisons.doc

Nora,

The attached document compares confidentiality experienced by different industries for different range approaches. By virtue of the CAFO ranges, all industries experience high confidentiality in the first five ranges (starting at 230% in range two and dropping to about 30% in range 5). In short, about 90% of facilities in the state experience at least 45-50% confidentiality. For the remaining 10% of facilities, we either:

- 1) use many ranges to cover all the facilities and give limited confidentiality, OR
- 2) limit the number of ranges required and dramatically increase confidentiality.

Frankly, it was difficult to argue my first proposal when the vast majority of facilities already had great confidentiality and boosting the cattle range breadth to 1,000 simply extended that high confidentiality out a range or two. Increasing the beef cattle number to 5,000 is the same effect: it reduces the number of ranges required but extends at least 50% confidentiality for all but a very, very, very few facilities (i.e., those above 16,000 animals).

As I revise my presentation, I'd appreciate your input on how to approach this with press and environmental folks. Other than limiting the number of ranges required, I'm casting about for a good argument . . . and I don't think the environmental folks will care how many ranges it takes to cover all facilities.

Regards,

Jeff



## Confidentiality Comparisons for Three Range Development Approach

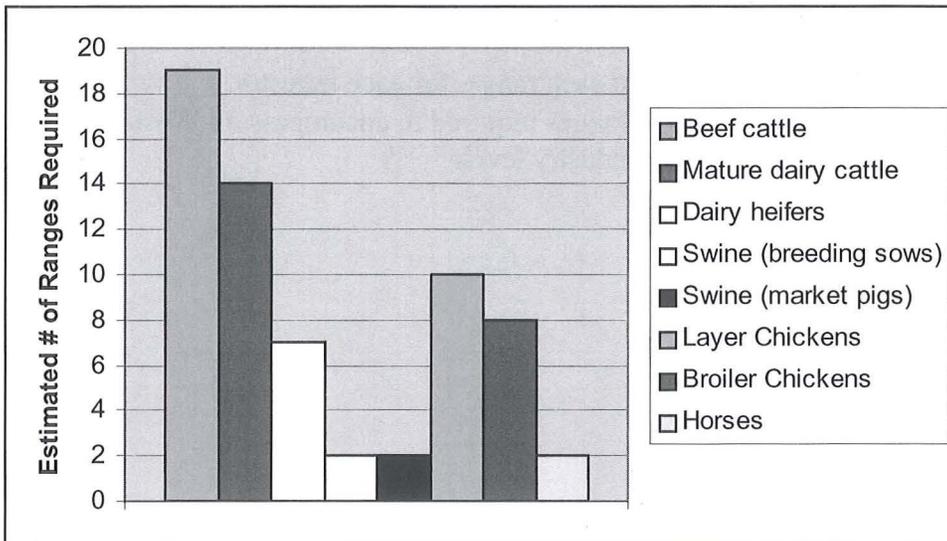
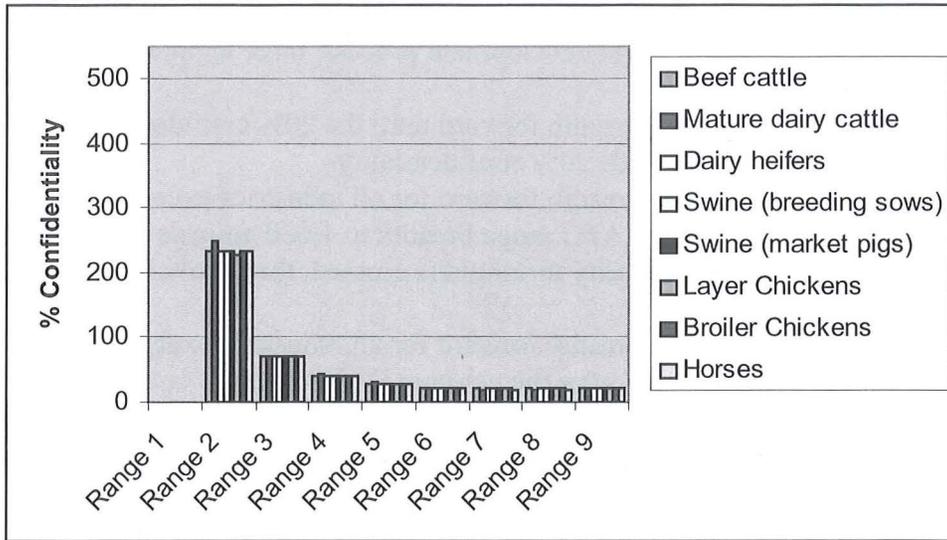
Because WSDA used the CAFO ranges as a starting point, all facilities in all livestock industries experience greater than 20% confidentiality in the first six ranges. In Range 2, for example, all facilities experience a confidentiality level of approximately 230% due to the initial CAFO ranges. In WSDA's range development process, three approaches were examined:

1. Carry the medium CAFO range breadth forward until the 20% confidentiality threshold was crossed, then provide 20% confidentiality.
2. Carry the medium CAFO range breadth forward for all industries except cattle. For cattle, increase the medium CAFO range breadth to 1,000 animals for later ranges. When the 20% confidentiality threshold is crossed, then provide 20% confidentiality.
3. Carry the medium CAFO range breadth forward for all industries except cattle. For beef cattle, use 5,000 animals after the medium CAFO range. For all other cattle use 1,000 animals after the medium CAFO range. When the 20% confidentiality threshold was crossed, then provide 20% confidentiality.

Each approach yields different level of confidentiality in the early ranges, sometime dramatically so. In addition, each approach impacts the number of ranges required to encompass all facilities at current industry levels. For each approach, the following graphs show

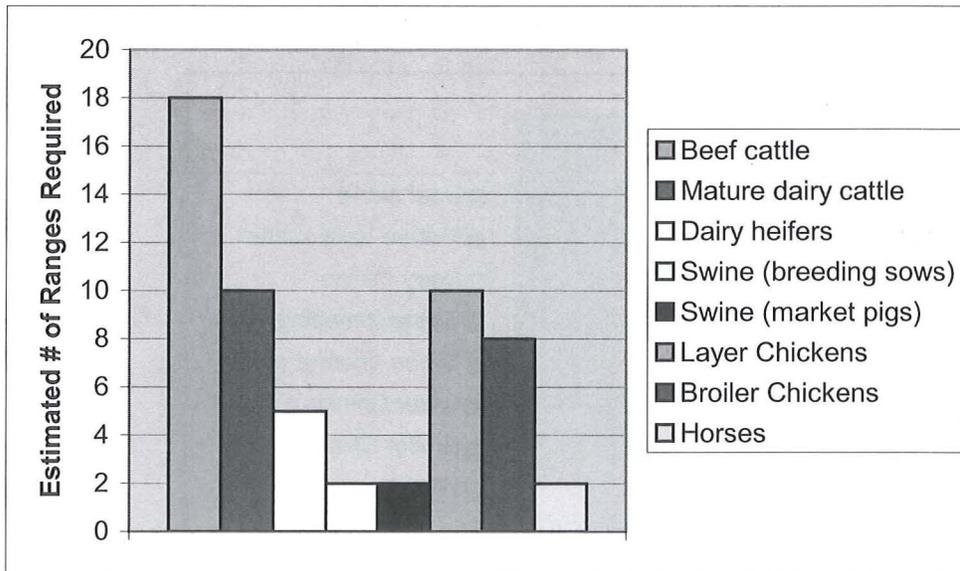
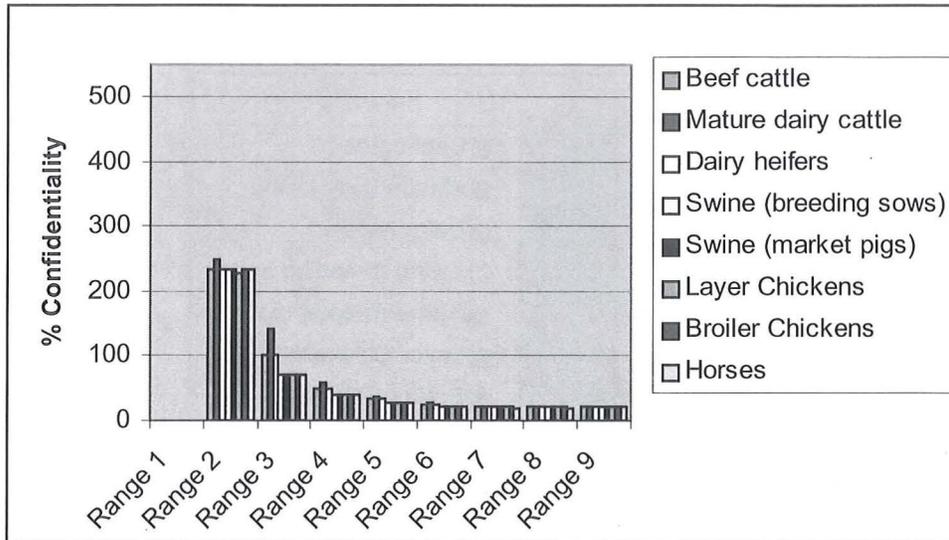
- The confidentiality level at each range, for each industry.
- The estimated number of ranges required to encompass all Washington State facilities at current industry levels.

**Approach #1:** Carry the medium CAFO range breadth forward until the 20% confidentiality threshold was crossed, then provide 20% confidentiality. Range 2 is the Medium CAFO Range.



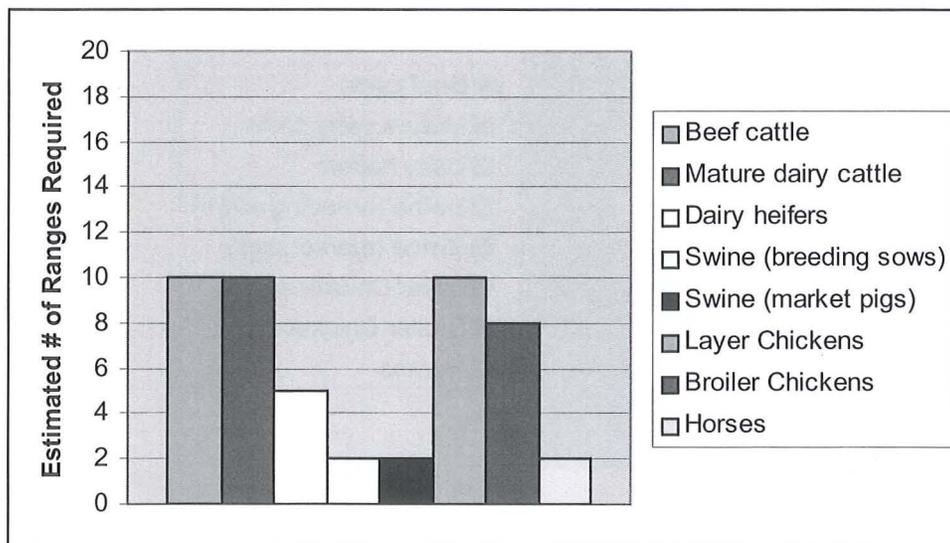
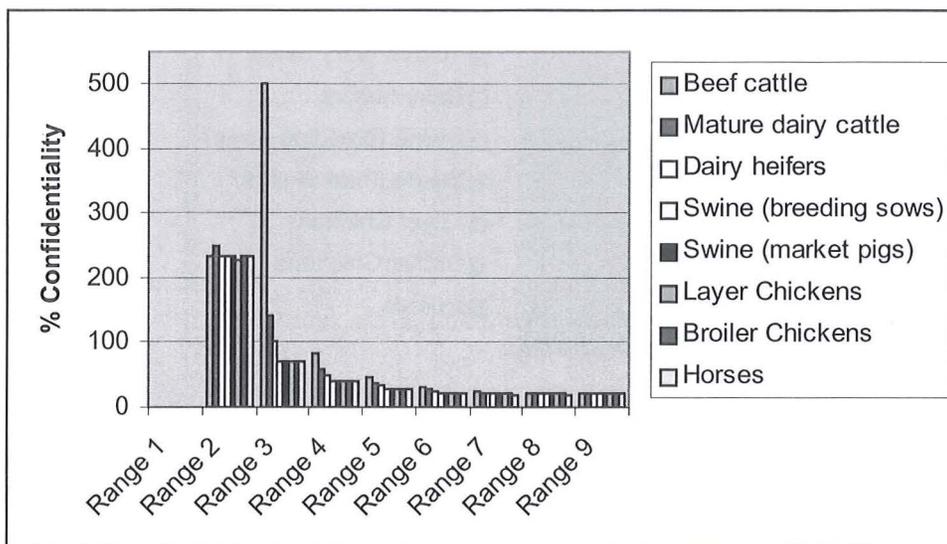
This approach gives very evenly distributed confidentiality levels. However, the approach requires 19 ranges to cover all beef cattle facilities and 14 ranges to cover all dairy facilities.

**Approach #2:** Carry the medium CAFO range breadth forward for all industries except cattle. For all cattle industries, increase the range breadth to 1,000 animals until the 20% confidentiality threshold was crossed, then provide 20% confidentiality. This was WSDAs original proposal. Range 2 is the Medium CAFO Range.



This approach gives evenly distributed confidentiality levels for all industries except dairy cattle, which gains approximately 40% confidentiality over beef cattle and approx. 70% confidentiality over other industries in Range 3. After range 3, confidentiality levels are approximately the same for all industries. However, the approach requires 18 ranges to cover all beef cattle facilities. All other cattle and poultry facilities are covered within 10 ranges.

**Approach #3:** Carry the medium CAFO range breadth forward for all industries except cattle. For all beef cattle facilities, increase the range breadth to 5,000 animals. For all other cattle industries, increase the range breadth to 1,000 animals. Once the 20% confidentiality threshold was crossed, then provide 20% confidentiality. This combines WSDAs original proposal with beef cattle industry requests. Range 2 is the Medium CAFO Range.



This approach ensures that all WA State facilities (for all livestock types) are encompassed in the first ten ranges. However, the beef cattle industry experiences tremendous confidentiality increases in the first few ranges. Beef industry has a 360% confidentiality increase over dairy cattle in Range 3, and 25% in Range 4. At Range 5, the beef industry still experiences a confidentiality level of 45%, when all other industries experience approx. 30% confidentiality.