



The League of Women Voters of Oregon is a 101-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

October 25, 2021

To: ODA CAFO Program
Attn: NPDES Permit Renewal Comments
Email: janet.SHORT@oda.oregon.gov

Re: Oregon Dept. of Agriculture CAFO Program - Comments

The League of Women Voters of Oregon submits the following comments related to the permitting process for large-scale concentrated animal feeding operations (CAFOs) in Oregon and, more specifically, as it relates to the proposed large-scale dairy CAFO near Vale. We base these comments on our positions regarding climate change, air quality, water quality, land use, and agriculture.

We support recently proposed changes to improve the permitting process and increase monitoring of CAFOs. However, these changes focus primarily on water quality issues as required by the federal Clean Water Act. We believe that equal attention should be given to the following areas:

- **Appropriate oversight of CAFOs**

Under current Oregon law, CAFOs are considered agricultural use and are given the same protected status and tax benefits as any other agricultural use in Oregon. The Oregon Department of Agriculture (ODA) is assigned responsibility for permitting and monitoring, even though there are a host of environmental issues related to CAFOs that would be more appropriately handled by the Oregon Department of Environmental Quality (DEQ).

We believe that CAFOs, with their huge holding tanks and waste ponds, should not be in the same category as smaller farming operations that align more closely with Oregon's Statewide Planning Goal 3, "to preserve and maintain agricultural lands." We concur with Tim Nesbitt's suggested changes for how Oregon should deal with CAFOs, as stated in his recent [article](#) "Left, Right, and Rural: A Case Study in Finding Common Ground" (*The Way* by OR360, October 12, 2021). We believe that Oregon's land use laws and monitoring systems concerning CAFOs need to be updated, and local communities deserve greater levels of transparency and more opportunities for input on siting and monitoring.

- **Air quality and greenhouse gas emissions**

While the protection of Oregon's surface and groundwater is extremely important, air pollutant health hazards from CAFOs are given less priority. According to the [CDC report](#) *Understanding Concentrated Feeding Operations*, "the most typical pollutants found in air surrounding CAFOs are ammonia, hydrogen sulfide, methane, and particulate matter, all of which have varying human health risks." When manure is later applied to land as fertilizer, there is the issue of "the volatilization of ammonia and the creation of nitrous oxide when nitrogen undergoes nitrification and denitrification." For example, it is estimated that the 10,000 cows on the proposed Recla dairy farm would produce 2.2 million cubic feet of manure per year, which would release up to 2991 lbs. of ammonia per day. Health risks from CAFO emissions include

chemical burns to the respiratory tract and chronic lung diseases such as asthma and bronchitis. It has been confirmed that children who live near CAFOs are especially vulnerable.

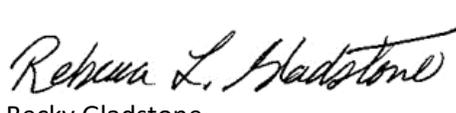
While methane emissions are not considered an immediate health risk, they are a significant contributor to climate change. The CDC estimates that 7% of greenhouse gas emissions in the U.S. come from CAFOs in the form of methane and nitrous oxide, "which are 23 and 300 times more potent as greenhouse gases than carbon dioxide, respectively." Oregon has an ambitious goal to reduce greenhouse gas emissions by 75% by 2050. While transportation accounts for most emissions in the form of carbon dioxide, the 2018 [report](#) *Oregon's Greenhouse Gas Emissions Through 2015* states that methane "comprises approximately 10 percent of the statewide sector-based total." It is time for Oregon to acknowledge the role that CAFOs play in producing methane and thereby accelerating climate change.

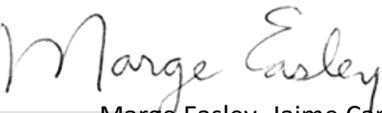
- **Environmental justice**

The issue of environmental justice is especially relevant when it comes to CAFOs. In her recent [report](#), *Oregon's Concentrated Feeding Operations*, Lewis and Clark law student Josie Moberg states, "animal agribusiness consolidates operations into these crowded facilities in order to maximize output and profit. However, it comes at a cost in terms of environmental harm, the burdens of which are appropriately born by vulnerable communities predominantly comprised of low-income people of color." CAFOs are most often located in economically depressed areas, where environmental issues may be overlooked in favor of job creation. Workers at these operations, often undocumented, are subject to low wages and exposed to health risks and psychological trauma that contribute to generational poverty. And even if workers could prove they were harmed, CAFOs are granted immunity from lawsuits due to a U.S. Environmental Protection Agency agreement that began in the late 1990s.

Another aspect to the environmental justice issue is the fact that CAFOs, despite their size, do not provide a significant tax base for depressed Oregon counties. Owners, most often corporate conglomerates, are given agricultural tax breaks and even subsidies. Local communities, therefore, gain little economic advantage, and other potential businesses may shy away from locating in the area due to foul smells and risks to health and the environment.

We urge a review of current permitting processes of CAFOs and a more thorough assessment of the full range of their impacts in Oregon. Thank you for providing the opportunity to comment.


Becky Gladstone
LWVOR President

 
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LWVOR Action Committee

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