



The League of Women Voters of Oregon is a 102-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.

May 23, 2022

To: ODA CAFO Program
Email: Janet.Smith@ODA.Oregon.Gov
Attn: Applicant Silver Stream Jerseys/Shannon Lourenzo

RE: Proposed CAFO Expansion in Tillamook - Silver Stream Jerseys/Shannon Lourenzo – Comments

The League of Women Voters of Oregon submits the following comments related to the proposed permit approval for a Large 1 Tier CAFO permit owned by Shannon Lourenzo. These comments are based on the League positions on climate change, air quality, land use, agriculture, and environmental justice.

The Tillamook City resident Shannon Lourenzo is requesting a substantial change, an expansion from a small and medium dairy to a Large Tier 1 feedlot that would allow for up to 2,499 dairy cows. To put this request into context, 549,798 pounds of methane will be turned into 7,746.9 gigatons of carbon dioxide and released into the air. While methane from cattle is shorter-lived than carbon dioxide, it is thought to be 28 more times more potent in warming the atmosphere and more damaging than auto emissions. The U.S Government Accountability Office reported that in addition to methane, “The storing of large quantities of manure on factory farms could cause emissions of unsafe quantities of ammonia, hydrogen sulfate, particular matter, and odors.”

The League remains concerned about the proliferation of large-scale feedlots in Oregon. We reiterate our support for increased monitoring of the air and water quality near CAFOs, as required by the federal Clean Water Act, and a return to environmental monitoring and oversight by the Oregon Department of Environmental Quality. In addition, we urge the following:

- **Complete transparency regarding health hazards** for those who live and work near proposed and existing CAFOs, including the effects of exposure to air pollutants, such as ammonia, hydrogen sulfide, methane, and particulate matter. The 2018 Fair Agriculture Reporting Method (Farm) Act exempts CAFOs from reporting requirements despite that reflects a desire for our state to be a leader in stopping greenhouse emissions.
- **Appropriate oversight of CAFOs.** Under current Oregon law CAFO's 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 CAFO's, 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 statewide planning Goal 3.
- **Greater attention paid to the environmental justice aspect of CAFO siting.** Workers in these facilities may experience asthma-like symptoms, bronchitis, chronic obstructive airway disease, intestinal disease, lung disease, and organic dust toxic syndrome. This is especially concerning for those with weakened immune systems and respiratory issues. A 2021 study, “Oregon Concentrated Feeding Operations: Air Quality at the Epicenter of Environmental Justice Issues and Regulatory Solutions” by Josie Rosenberg talks about how the Oregon resident's input is frequently ignored. “For example, during a public comment period in 2016, Oregon community members submitted thousands of comments opposing a new large CAFO, but the agency ultimately permitted the operation despite this public outcry.” The laborers employed in this

industry are also members of marginalized demographics and are often undocumented immigrants. Additionally, property values go down when CAFOs move into these communities. Residents and businesses suffer because no one wants to live next to the foul smell and pollution.

For these reasons, we urge more careful consideration of the approval for the large Tier 1 CAFO. Thank you for providing the opportunity to comment,



Becky Gladstone
LWVOR President



Jaime Carleton
LWVOR CAFO Portfolio

Cc:

Alexis Taylor, Director. Oregon Department of Agriculture (Alexis.Taylor@oda.oregon.gov)
Richard Whitman, Director Department of Environmental Quality (richard.whitman@deq.state.or.us)
Jason Miner, Governor's Natural Resources Policy Director (Jason.minor@oregon.gov)
Morgan Gratz-Weiser, Governor's Natural Resources Policy Advisor (Morgan.GRATZ-WEISER@oregon.gov)
Environmental Justice Task Force. (EJ.TaskForce@Oregon.gov)