



March 17, 2021

Re: Senate Bill 583 and House Bill 2924, a moratorium on the permitting of new and expanding industrial dairies.

Dear Oregon Legislative Assembly,

The 34 undersigned organizations urge you to support enactment of a legislative moratorium on new and expanded mega-dairies over 2,500 cows in Oregon.

Oregon agriculture is at a crossroads. A rapidly changing dairy industry has fueled the rise of huge dairy factory farms in Oregon. These 'mega-dairies' concentrate large numbers of animals and their untreated waste. These mega-dairies are mega-polluters threatening our air, water, climate, animal welfare, small farmers and rural communities. If the legislature doesn't act now, Oregon is poised to become the next hot-spot for polluting industrial mega-dairies.

In 2019, the American Public Health Association adopted a policy statement calling for a national moratorium on new and expanding concentrated animal feeding operations, including mega-dairies, until public health threats could be adequately identified and addressed.¹ A mega-dairy moratorium in Oregon joins a growing chorus of urgent calls at the national and local level to address the hazardous pollution and public health treats from these facilities.

As mega-dairies have become more prevalent, Oregon has also lost many of its small and mid-sized family-owned dairies, once the backbone of rural Oregon's economy. Mega-dairies have been flooding the market with milk for years, contributing to Oregon losing more than a third of its licensed dairies since 1997 with an average of nine family dairy farms going out of business each month between 2002 and 2007, even as the number of overall cows in the state have increased.²

¹ Johns Hopkins Center for a Livable Future. "American Public Health Association calls for a national moratorium on new and expanded concentrated animal feeding operations." June 2020.

² Fridley, Dallas. "Oregon dairy production stalls as milk prices fall." State of Oregon Employment Department. August 30, 2018 at 12.

The untreated waste produced by mega-dairies is typically flushed into large manure lagoons, where it is stored until it is applied as fertilizer on fields. In 2019, Oregon's mega-dairies produced 6.5 billion pounds of manure —twice the amount of waste produced by the population of more than 2 million people in the Portland Metropolitan area.³ The sheer amount of manure mega-dairies produce often exceeds what crops can absorb, resulting in over-application and runoff into local waterways. In addition to the run-off, recurring accidents and spills at other Oregon mega-dairies have had a significant impact on our surface water. Oregon's Department of Environmental Quality has identified Confined Animal Feed Operations as a primary source of dangerous nitrate contamination that threatens nearby community health in the Lower Umatilla Basin Groundwater Management Area.⁴

Not only do mega-dairies pollute Oregon's scarce water supplies, they also threaten to drain our already scarce water resources. Mega-dairies use enormous amounts of water. All told, the water demand adds up to that of a city the size of Bend. This immense water use threatens Oregon's already stressed rivers, streams and groundwater aquifers.

Oregon's mega-dairies are a significant source of unregulated air pollution and climate emissions in our state. The large quantities of manure animals confined in these facilities emit substantial amounts of harmful air pollutants, including ammonia, hydrogen sulfide and particulate matter. These pollutants are known to cause respiratory symptoms and nuisance odors and also contribute to regional haze, which is harming the iconic Columbia River Gorge National Scenic Area.⁵ Mega-dairies also are a major contributor to climate change. Livestock production is responsible for 14.5% of all anthropogenic greenhouse gas emissions globally,⁶ and is a dominant source of methane gas emissions in the United States.⁷ Mega-dairies cannot be part of Oregon's future if we want to do our part to prevent the worst effects of climate change.

The same extreme confinement that leads to water and air pollution and harms rural communities can threaten animal welfare. Cows are highly confined and typically live their entire lives in buildings, often standing or lying all day in their own manure with little or no access to the outdoors. These confined conditions prevent physical movement and can result in disease and infection, stress disorders, stunted growth, and chronic lameness.⁸

The expansion of mega-dairies is wreaking havoc on Oregon's family farms, rural communities, and the environment. A moratorium will give legislators and regulators an overdue opportunity to

³ FWW analysis of ODA (2019); FWW. "Factory Farm Nation: 2020 Edition." April 2020 at 10.

⁴ Oregon Department of Environmental Quality (DEQ). "Estimation of Nitrogen Sources, Nitrogen Applied, and Nitrogen Leached to Groundwater in the Lower Umatilla Basin Groundwater Management Area." June 13, 2011 at ii and 1; Oregon DEQ. "Analysis of Groundwater Nitrate Concentrations in the Lower Umatilla Basin Groundwater Management Area." February 23, 2012 at Table 5-1, Table 5-2, Figure 1-1; Oregon DEQ. ODA. "Lost Valley Farm CAFO Permit – Frequently asked questions." at 1.

⁵ Oregon Department of Environmental Quality. "Oregon Regional Haze Plan: 5-Year Progress Report and Update." February 2016 at i and 21. And Flatt, Courtney. "Mega-dairy air pollution threat puts environmentalists on alert." EarthFix. April 11, 2017 at 2.

⁶ Gerber, P. J. et al. (2013). Tackling Climate Change Through Livestock: A Global Assessment of Emissions and Mitigation Opportunities. Rome: FAO at xii.

⁷ U.S. EPA. "Inventory of U.S. Greenhouse Gas Emissions and Sinks; 1990-2009." Table 2-1. April 15, 2010 at 2-4.

⁸ The Humane Society of the United States. "An HSUS Report: The Welfare of Cows in the Dairy Industry." 2009 at 1, 2, 4, 5.

evaluate the public health, economic, animal welfare, and environmental impacts of mega-dairies while providing Oregon's most impacted communities with important statutory protections.

We urge Oregon Senators and Representatives to support legislative proposals for a moratorium on new and expanded mega-dairies in Oregon.

Sincerely,

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