

CONSOLIDATED
O R E G O N
INDIVISIBLE
N E T W O R K

To Chair Jeff Golden, Vice Chair Fred Girod, and members of the Senate Natural Resources Committee:

We are a network of Oregon Indivisible groups that is known as the Consolidated Oregon Indivisible Network (COIN), <https://www.coinoregon.org/> COIN and its member groups have thousands of members across Oregon. COIN and its Climate Energy Environment (CEE) Team supports programs at the federal, state, and local levels that promote environmental sustainability. We are guided by an environmental and economic justice lens that incorporates diversity, inclusion, transparency, and democratic principles.

COIN is writing to urge the Committee to support SB 85-1, a moratorium on large CAFOs or factory farms. While COIN group members across Oregon have diverse interests, we are all concerned about air and water quality, the ongoing drought and drying conditions and their impact on Oregonians' health and safety, our natural environment, and animals. COIN is also concerned about the economic and environmental justice impacts of continuing to allow concentration of Oregon's farming operations into large CAFOs that devastate family farms and nearby communities and residents.

It is information from DEQ and ODA that really brings home the importance of a moratorium on large CAFOs now.

In response to the Petition for a Dairy Air emissions regulatory program, which DEQ, denied in November, 2022, the agency cited a lack of resources as well as concern about its regulatory authority and ability to enforce certain emission prohibitions. DEQ had concerns about the methods for estimating emissions and the best management practices for reductions and determining compliance.

The air emissions of even the largest dairy CAFOs remain unregulated in Oregon.

This despite that in 2007 the legislature established a Dairy Air Task Force with diverse stakeholders that “strongly urged” DEQ and ODA to issue regulations in the face of the public health and environmental threat from large dairy CAFO emissions such as ammonia, methane, nitrous oxide, and more. As DEQ and ODA explained during the informational hearing last week on SB 85, after 15 years nothing has been done.

DEQ also does not regulate the GHG, methane and nitrous oxide (gases that are many times worse than carbon dioxide as global warming agents), from dairy CAFOs in its proposed Climate Protection Program. It is well-documented that in Oregon, agriculture is the leading source of methane emissions. That means large dairy CAFOs will continue to contribute to a hotter, drier climate and catastrophic impacts of climate change like drought and dangerous wildfires. The health impacts will be felt not only by workers in the vicinity but across communities, the state, nation, and planet. The economic and environmental impact from increasing air pollution from a growing number of unregulated dairy CAFOs is devastating Oregon’s family farmers. To allow more large CAFOs, now including chicken CAFOs, will mean the end of a way of life in Oregon for family farmers and more air and water pollution with the attendant health and environmental impacts for all of us. Why would we do this to ourselves for the profit of corporate owners that are based in other states or countries?

Also, more than one third of Oregon’s cows used for dairy are confined in CAFOs in Morrow and Umatilla Counties which have the highest percentage of Latinx residents in the state. The communities around these CAFOs are low income as well. There is a serious environmental injustice in allowing unregulated large dairy CAFOs to proliferate and threaten air quality and economic devastation in communities of color and low income communities.

On top of all this, during the informational hearing last week, it became clear that ODA and DEQ lack the ability to prevent groundwater contamination from the large amounts of manure from factory farms. There is no good way to store and dispose of the manure to prevent runoffs or leaks into the groundwater. Though this is not even the main concern. The waste held in CAFO lagoons is greenwashed by rebranding the manure as “organic fertilizer” which is dumped onto Oregon farmland and into the groundwater. There is far too much manure from these massive CAFO operations for existing crops. We have seen for decades drinking water contamination in the Lower Umatilla Basin accompanied by the algal blooms that are killing fish and other animals in our state waters. It is unthinkable that we would continue to allow in Oregon a business model that threatens our water resources in this way.

The state agencies also described the stockwater exemption and other water rights that allow CAFOs unlimited water supplies. This means a factory farm operation can use as much water or more as a city! And the state really has no good gauge right now for determining their water usage. A moratorium on these operations only makes sense, particularly as so much of Oregon is suffering from drought and dry conditions, wildfires, and other impacts of climate change that are likely to be ongoing.

Oregon's right to farm law, once enacted to protect Oregon's family farmers, is now a weapon employed by large factory farms to drive out family farmers and prevent local regulation and redress by residents and communities of most of the harms suffered from air and water pollution from CAFOs.

These are only some of the reasons a moratorium on CAFOs as described in SB 85-1 is imperative. As Oregon residents and voters, we urge you as our legislators to take action now to protect Oregon's air and water quality, public health, family farms, and animals by voting yes on SB 85-1.

Thank you,
Consolidated Oregon Indivisible Network (COIN) including its Climate Energy
Environment (CEE) Team