



Feb. 11, 2020

Dear Senate Committee on General Government and Emergency Preparedness Members:

We, the below signed members of Stand Up to Factory Farms (a coalition of local, state, and national organizations concerned about the harmful impacts of mega-dairies on Oregon's family farms, communities, environment, and animal welfare), support your efforts to address persistent nitrate contamination in rural Oregon, but are concerned that Senate Bill 1562 does not go far enough.

Nitrate contamination in Morrow and Umatilla Counties is not a new problem; Oregon designated the Lower Umatilla Basin Groundwater Management Area (LUBGWMA) in response to this pollution thirty years ago. And the LUBGWMA Committee tasked with bringing the area's nitrate concentrations back within safe levels established its First Action Plan in 1997. The state has thoroughly studied the area's hydrology, its vulnerability to contamination, its predominant land uses, and the sources of nitrate contributing to the problem.

Unfortunately, the Committee's plans have focused on voluntary approaches to addressing the agricultural nitrate contributions driving the persistent contamination, and the 2019 Action Plan doubles down on this approach. Put simply, research is not the missing piece of the puzzle – action is.

Yet SB 1562 follows the same inadequate path, proposing to establish and fund a task force to further review of existing research and come up with yet another long-term implementation plan to address contamination. Further study, without real, immediate action to restrict existing pollution, provide clean water to residents, and prevent new sources of pollution in the GWMA, is not the answer.

Moreover, the bill is misguided in placing the Oregon Department of Agriculture in charge of these efforts. The Department of Agriculture's mission includes promoting agriculture; requiring the agency to establish a plan to reduce pollution from the same industry presents an inherent conflict of interest.

In fact, as the Committee considers this bill, ODA is considering allowing another massive source of potential nitrate contamination to operate in the LUBGWMA – Easterday Farms. This mega-dairy would be permitted to be far larger than the disastrous Lost Valley Farm’s population reached, and would introduce 173 million gallons of nitrate-laden waste into the GWMA.

We don't need any more studies to know that allowing Easterday Farms to open in an area already plagued by unsafe levels of nitrate pollution defies common sense. Any plan to address the LUBGWMA that ignores this threat and proposes merely more study misses the mark. Rather than rearranging the deck chairs on the Titanic, **Oregon must establish a moratorium on new and expanding mega-dairies**, provide impacted residents with clean, safe water, and enact serious mandatory measures to reduce nitrate contamination from existing sources – including mega-dairies – in the LUBGWMA.

While further study of the hydrologic units in the LUBGWMA could be part of the solution to ensure that rural Oregonians have access to clean, safe water, any bill that allows for new mega-dairies while the state buys time to study a problem that it has largely understood for decades is not a strong enough step in the right direction. Oregon needs a moratorium on new and expanded mega-dairies, not another task force.

Respectfully,

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Friends of Family Farmers

Tarah Heinzen  
Food & Water Watch

Kristin Ostrom  
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