

Dear Chair Golden, Vice-Chair Nash, and members of the Senate Committee on Natural Resources and Wildfire,

I'm writing to express my support for SB80 which would place a moratorium on large concentrated animal feeding operations (CAFOs) within Oregon's three groundwater management areas (GWMAs) which have dangerously high levels of nitrate contamination in groundwater. Chronic exposure to elevated levels of nitrates in drinking water poses severe health risks, including certain types of cancer, thyroid disease, and reproductive issues—such as Blue Baby Syndrome, a life threatening condition in infants. The EPA's maximum contaminant level for nitrates in drinking water is 10mg/l, yet data has shown that households in the Lower Umatilla Basin GWMA are reporting levels that far exceed this threshold, a trend that has been getting worse since it was first declared a GWMA in 1990.¹

Industrial-scale animal agriculture produces a staggering amount of untreated waste which is stored in large, open-pit cesspools referred to as “lagoons” before it is recklessly spread on fields at volumes exceeding what the soil can absorb. Overapplication of manure on fields and the inevitable leaks and malfunctions of manure lagoons lead to nitrates, along with other contaminants, leaching into our groundwater making industrialized animal agriculture a major contributor to our current groundwater crisis. Oregon's 11 large, tier 2 dairy CAFOs produced roughly 4 billion pounds of waste in 2022 which is more than 2/3rds of the state's human population—enough manure to overflow 2.5 Olympic-sized swimming pools each day.² Unlike human waste, factory farm waste does not undergo strict treatment before being released into the environment. There are currently 129 facilities operating with Large Tier 1 & 2 CAFO permits in our state which means the number of waste produced by this industry is far higher, and it's not surprising that there is such a major overlap between GWMAs and our state's highest concentrations of factory farms.

More specifically, the Threemile Canyon mega-dairy complex operating in the Lower Umatilla Basin GWMA, confines roughly 67k cows which has produced about 118 million pounds of solid manure and 528 million gallons of liquefied manure per year since 2011, according to their Animal Waste Management Plans. Additionally, Animal Waste Management Plans (AWMP) for Threemile Canyon indicates that the manure spread on nearby farm fields contained about 9.3 million pounds of nitrogen.³ The case of Threemile Canyon is a clear example of how our regulatory agencies have failed to protect the residents living in GWMAs from the reckless expansion of an industry known to be a primary driver of nitrate contamination in groundwater.

¹ Oregon Department of Environmental Quality. *Groundwater Nitrate Trend Analysis*. Lower Umatilla Basin Groundwater Management Area Well Network. 22 January 2025.

² Oregon Department of Agriculture. ““OR AFO Spreadsheet 2021.”” *Food & Water Watch*, 2021, https://www.foodandwaterwatch.org/wp-content/uploads/2024/09/FSW_0924_FFMap_OR.pdf. Accessed 01 April 2025.

³ Oregon Rural Action. “Press Release - Oregon Rural Action Releases Map of Pollution Sources in the Lower Umatilla Basin.” <https://www.oregonrural.org>, 2024, <https://www.oregonrural.org/pressreleases/2024/9/30/oregon-rural-action-releases-map-of-pollution-sources-in-the-lower-umatilla-basin-press-release>. Accessed 01 04 2025.

Despite DEQ declaring the region a critical GWMA back in 1990, ODA still issued Threemile a CAFO permit in 2001 and the facility has expanded significantly to become one of the largest mega-dairies in the United States. It should come as no surprise that the level of contamination has risen in tandem with the rise of industry in this region due to lagoon storage and the overapplication of waste on nearby fields.

I'd also like to clarify that the language of this bill makes it clear that the moratorium would only apply to facilities operating under large (tier one and two) CAFO permits located within specific areas designated GWMA's. SB80 is about holding massive industrialized animal agriculture operations, who thrive on a business model that puts profits over people, accountable for their pollution and the damage they have inflicted on our communities—including the economic harm that independent farms are facing across the state. The rapid expansion of industrialized animal agriculture has driven independent farms out of business, or forced them into taking on the factory farm model. Corporate-backed CAFOs consolidate market power, drive down prices, and consume local resources at unsustainable rates. Unchecked corporate agribusiness is the true threat to independent farmers, not regulations that protect our land, labor, and natural resources.

Oregon has the potential to lead the transformation of our agricultural system into something that benefits the people, our planet, and our natural resources. Passing a moratorium on large CAFOs within our state's critical Groundwater Management Areas would protect drinking water for tens of thousands of people across our state, help reduce climate change-causing emissions, and begin to force a shift toward a more localized food system – one that prioritizes environmental health, community well-being, and economic resilience of our communities. SB80 is a measured and necessary response to Oregon's drinking water crisis. SB80 would protect our communities by ensuring that the existing sources of pollution are addressed before any new or expanding operations are permitted. I strongly urge you to support this SB80 and defend safe drinking water for all Oregonians. Thank you for your time and consideration.