



April 4, 2025

Oregon State Legislature
Senate Committee on Natural Resources and Wildfire
900 Court St. NE
Salem, OR 97301

RE: Support for Senate Bill 80, Relating to water quality permits for confined animal feeding operation

Dear Chair Golden, Vice-Chair Nash, and members of the Committee,

On behalf of the more than 55,000 members and supporters of the Sierra Club Oregon Chapter, we write in support of Senate Bill 80, which would prohibit the Department of Environmental Quality (DEQ) from issuing a water quality permit to certain confined animal feeding operations (CAFOs) located in a groundwater management area.

More needs to be done to protect our quality of life – the air, soil, and water quality – from the effects of large CAFOs.¹ DEQ's issuance of water quality permits, as related to important groundwater management areas, will go a long way towards that objective. Large CAFOs raise significant environmental, health, and ethical concerns, including pollution of air and water, health risks for workers and communities, and animal welfare issues.²

One example is the industrial farming that is contaminating an aquifer that eastern Oregon residents rely on.³ For years many Oregon families have suffered from health problems associated with nitrates from large CAFOs: colon cancer, blue baby syndrome,

¹ The term "large CAFO" is used because in Oregon small livestock farms can also fall under the program. Federally, large CAFO facilities are defined as those housing at least 700 dairy cattle, 2,500 pigs or up to 125,000 chickens.

<https://www.opb.org/article/2024/05/17/oregon-cafo-water-pollution-permit-changes/#:~:text=CAFO%20operations%20are%20spread%20throughout,include%20dog%20kennels%20and%20zoos>.

² Why are CAFOs bad? <https://www.sierraclub.org/michigan/why-are-cafos-bad#sustainable>

³ Oregon regulators have had decades to tackle the Umatilla Basin's water pollution, but it's only gotten worse. <https://www.kgw.com/article/news/local/the-story/umatilla-water-contamination-regulatory-inaction/283-50eef0e2-7f2f-40de-9050-aa8d981b28b4>



and miscarriages. Adopting SB 80 will help protect communities in groundwater management areas. It will also help prevent large, out-of-state companies from moving into Oregon and threatening small family farms.

What pollutants do large CAFOs produce? CAFOs produce huge amounts of animal sewage and other pollutants. CAFO owners and operators spend millions of dollars on technologies that make it possible to produce massive quantities of milk, eggs, and meat, yet they resist investing in technologies and practices to properly treat the wastes that are by-products of this industry:

- The amount of urine and feces produced by the smallest CAFO is equivalent to the quantity of urine and feces produced by 16,000 humans.
- CAFO waste is usually not treated to reduce disease-causing pathogens, nor to remove chemicals, pharmaceuticals, heavy metals, or other pollutants.
- Over 168 gases are emitted from CAFO waste, including hazardous chemicals such as ammonia, hydrogen sulfide, and methane.
- Airborne particulate matter is found near CAFOs and can carry disease-causing bacteria, fungus, or other pathogens.
- Animals frequently die in CAFOs. Their carcasses, often in large numbers, must be dealt with.
- Infestations of flies, rats, and other vermin are commonplace around CAFOs and therefore around CAFO neighbors.

Owners of CAFOs often argue that the wastes produced by their livestock provide nutrients that help offset the use of synthetic fertilizers. The sheer amount of wastes produced, however, often overwhelms the ability of the land and crops to absorb CAFO wastes.

What contaminants exist in CAFO waste? In addition to plant nutrients such as phosphorus and nitrogen, CAFO waste is likely to contain:

- antibiotic-resistant bacteria
- hormones
- chemicals used in livestock care

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- [milkhouse wastes](#)
- cleaning agents
- ammonia and heavy metals
- [silage leachate](#)
- millions of gallons of water contaminated by all of the above.

CAFO waste is often stored untreated in massive anaerobic waste storage structures or pits for up to six months. After storage, it is spread on farm fields for disposal. This is where CAFO wastes often enter surface water.

Nutrients in this CAFO waste can cause bright-green [algae](#) blooms in ditches, streams, and lakes. As these surface-water [algae blooms](#) die off, the oxygen in the water is depleted. This can lead to fish kills. Additionally, drinking water treatment plants must remove these nutrients before water is fit for consumption.

How do large CAFOs pollute water? Water pollution is possible at virtually any point in a CAFO's operation. It may take dozens of trips per day by semis or tanker trucks to dispose of CAFO waste. These trucks haul the wastes from the production area waste-storage structures to fields that are often many miles away.

When CAFO wastes are applied to farm fields, water pollution can be caused by overapplication of wastes, direct runoff into surface waters, or by traveling through the ground or catch basins into field tiles or drainage ditches that discharge directly into surface waters. Tests have shown that waste applied to the surface of a field can take as little as 45 minutes to reach the field tiles three to four feet below the surface.

Are large CAFOs sustainable? No. CAFOs are resource-intensive and unsustainable. Their animal-raising practices are neither economically viable nor sustainable. They use large amounts of electricity for lighting, equipment, milkers, pumps, and irrigators. They use fuel in enormous quantities to run tractors, gas motors, and pumps, and to transport milk, waste, supplies, and chemicals. CAFOs use millions of gallons of clean fresh groundwater to dilute waste and to wash manure from milking parlors and CAFO barns.



For all of the above reasons, we urge you to support Senate Bill 80. Many rural residents in Oregon are faced with large CAFOs being located in their area. We can no longer rely on intervention from the federal EPA to address this crisis, so our state elected officials are needed. We need your support to ensure that water quality permits for large CAFOs within groundwater management areas are halted and contamination is brought down to safe levels.

Respectfully submitted,

Emily Bowes, Policy Strategist

A handwritten signature in black ink that reads "Emily Bowes". The signature is written in a cursive, flowing style.

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