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August 4, 2016

William Matthews
ODA/CAFO Program
635 Capitol Street NE
Salem OR 9730-2532
E-mail: wmatthews@oda.state.or.us

Re: Lost Valley Ranch NPDES Permit/Application to Register

Dear Mr. Matthews:

Humane Oregon is an Oregon nonprofit corporation formed in 2014 to advocate for improved animal welfare in Oregon. Please consider our comments as follows on the above matter.

We submit these comments primarily to join others in expressing concern about the treatment of animals on large, industrial dairies such as the one proposed (as well as the nearby Threemile Canyon Farms). These concerns include excessive confinement and lack of exercise for the production cows, continued pregnancy of the cows, early separation of the calves from their mothers, and extreme confinement and early death of unwanted calves.

We realize these concerns are not technically relevant to the above proceeding but hope they will add to the growing voice of concern about these issues.

Meanwhile, given the consequences for animals, we urge you to apply strict scrutiny to water quality issues posed by the above application, including the many water quality issues raised by commenters with expertise in that area. As non-experts on water quality issues, we note only that the application proposes to have 30,000 cows produce 137,737,000 gallons of "manure, litter, and wastewater" per year in close proximity to the Columbia River and above an important groundwater aquifer. Surely that poses serious negative water quality impact, which should lead to denial of the permits without clear proof that the impacts can be prevented.

Thank you for considering these comments.

Sincerely,

Brian Posewitz

Brian Posewitz
Administrator, Humane Oregon