

TESTIMONY OF LAURAN DUNDEE, ON BEHALF OF THE NORTHERN PLAINS
RESOURCE COUNCIL, ON THE PROPOSED RENEWAL OF THE STATEWIDE GENERAL
MPDES DISCHARGE PERMIT FOR CONCENTRATED ANIMAL FEEDING OPERATIONS
(CAFOs) IN MONTANA

Environmental Quality Council (EQC) Public Hearing, 6:30-8:30 pm, October 21, 1999 at
Montana Fish, Wildlife & Parks Region 4 office, Great Falls, MT .

Good evening. My name is Lauran Dundee. I live in Stockett, MT, and I am a current member and former board member of the Northern Plains Resource Council (NPRC). I am testifying this evening on behalf of NPRC.

We support the EQC's determination to gather the most information possible on factory farming and its impact on the land, air, water and people of Montana. We believe the Department of Environmental Quality (DEQ) has insufficiently analyzed the state's existing CAFOs and is largely ignoring the threat posed by giant animal factories.

The trend toward factory-style agriculture has gotten ahead of federal and state regulations, and the result is serious water pollution. Nationwide, the track record for these companies is terrible, and they clearly seek out states and communities with the weakest regulations. If we have weak regulations, we are inviting them to do business here.

Northern Plains Resource Council believes animal factories are bad for family agriculture, bad for public health, bad for neighboring property owners and bad for the environment. If Montana chooses to allow animal factories to be sited here, we believe they must be held to the very highest standards of responsible operation and environmental protection. Otherwise, we are putting at risk the property and quality of life of many Montana citizens.

Currently large-scale industrial animal factories can be sited in Montana with virtually no substantive protections for neighboring people or communities. MEPA requires that all potential environmental impacts be identified and mitigated, but DEQ staff and financial limitations preclude a comprehensive inventory and DEQ, by its own description, "does not have comprehensive information on the total number and location of Montana's livestock operations."

We believe that DEQ must require permits of all facilities which meet the CAFO criteria, beginning with the biggest corporate operations, if we are to have a meaningful regulatory program for these factory farms. DEQ currently has 42 CAFOs permitted in the state, but a "limited industry survey" from 1993 indicated there were several times that number that should have permits.

We also believe there are viable alternatives to factory farms, which need to be part of the record: specifically family farms and a fair market system that pays all those whose labor helps grow our food.

The Racicot Administration has stated a goal of having one million hogs in Montana by 2005. This will only happen by recruiting industrial hog factories to the state. This could involve operations on the scale of a recently approved 800,000-hog factory in South Dakota.

We request that DEQ initiate a public scoping process for a programmatic environmental impact statement (EIS). This would provide opportunities for further input from the general public and other agencies, identification of further impacts, and a greater choice of alternatives.

A programmatic EIS is the appropriate vehicle under MEPA for DEQ to meet the challenge of bringing existing CAFOs into compliance with water quality laws, and for establishing a regulatory framework to protect the public health and safety from the environmental, social and economic impacts of large-scale, industrial animal factories that may locate in Montana over the five-year life of this permit.

A thorough analysis is the first step toward ensuring that the state will be able to fully protect our constitutional right to a clean and healthful environment.

Thank you for the opportunity to testify.

**EQC Water Policy
Subcommittee**
October 21, 1999