



January 15, 2019

Via Electronic Mail

Richard Whitman
Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100
WHITMAN.Richard@deq.state.or.us

Dear Mr. Whitman,

In the dairy sector, it is important to create value in two ways: optimize the quality of milk and improve responsible manure production and management. At the Tillamook County Creamery Association (TCCA), our milk quality has dramatically improved over the past two decades, and we are continuously improving responsible manure management. One way to improve manure management is through anaerobic digestion. Anaerobic digester technology is proven technology for odor, GHG, and pathogen reduction as well as energy production. For these reasons, TCCA promotes actions and policies that streamline the development of digesters locally, regionally, and nationally.

Because TCCA supports development of manure digesters in a variety of locations and sizes, we believe that the pathogen reduction rule should be consistent whether the digester is on-farm or off-farm. Any digester that accepts manure as the majority of its substrate is sending the digestate back to the participating farms for land application because the farmers want those nutrients for crop fertilization. The land application provides an additional nutrient filtration step that may not occur with non-manure digesters. Additionally, the digester is capturing methane—a powerful greenhouse gas—from the manure that would not occur with land application of raw manure. Nutrient filtration and methane capture are both significant environmental benefits.

In the case of the community digester at the Port of Tillamook Bay, there is public infrastructure that is currently sitting idle, which could be providing the environmental benefits described above. While that asset sits idle, our farms and fisheries have limited capacity for their manure and food waste. We would like to see the Port digester get back online as soon as possible. We believe that goodwill toward the Port digester could pave the way for future digesters.

Sincerely,

Sarah Beaubien
Senior Director, Stewardship