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January 15, 2019

Richard Whitman, Director  
Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232-4100

*Sent via E-Mail: Whitman.Richard@deq.state.or.us*

**RE: Methane Digester Pathogen Reduction Rule**

Dear Director Whitman:

The ODFA has proudly served the Oregon dairy industry since 1892. Since inception, the industry has evolved, due in part to technology, advocacy and scientific research. We believe there is tremendous opportunity in the evolution of technology and innovation, especially in manure management. We see potential to increase the usage and marketability of manure and manure-based products; utilize manure to develop a cost-effective, low-carbon alternative to diesel fuel; and recycle essential nutrients. Digesters and related technologies are central to progress in these areas.

By embracing continuous improvement in farming practices and manure management, farm risks are minimized, rural resilience is supported, positive relationships with natural resource industries are developed, and pathways to more cost-effective energy are created. ODFA supports development of manure digesters in a variety of locations and sizes across the state. We understand your agency is considering the pathogen reduction rules which govern on farm and off farm digesters. The ODFA supports the amendment to the existing rules to create consistency.

As you are aware, there is a community digester at the Port of Tillamook Bay which is sitting idle. This digester could be providing environmental benefits and a delivery point for the manure from local dairy farms for processing.

Thank you for ensuring the impediments currently causing delay to the startup of this digester are addressed in as efficient and expeditious manner as possible. The ODFA appreciates your willingness to engage and create solutions that are beneficial to a broad array of stakeholders to achieve positive environmental outcomes.

Respectfully,

A handwritten signature in blue ink, appearing to read "Chad V. Allen".

Chad Allen, President  
OREGON DAIRY FARMERS ASSOCIATION



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



LEGAL & STRATEGIC AFFAIRS

January 22, 2019

**VIA EMAIL**

Mr. Richard Whitman  
Department of Environmental Quality  
700 NE Multnomah Street, Suite 600  
Portland, OR 97232-4100  
[Whitman.Richard@deq.state.or.us](mailto:Whitman.Richard@deq.state.or.us)

**Re: Pathogen Reduction Rules for Anaerobic Digesters**

Dear Mr. Whitman,

I write on behalf of the Pacific Seafood Group ("Pacific") in support of the proposed DEQ Pathogen Reduction Rule Amendment that encourages the use and development of manure digesters within the State of Oregon.

Pacific is a family-owned company that cares deeply about the environment, the well-being of our team members, and the communities with whom we partner. Sustainability is inherent in our approach to business and we continually strive to find new ways to be better stewards of the environment and our communities. Our efforts have been recognized by many industry and environmental groups, which is why Pacific Seafood is the first and only company in the world to offer BAP (Best Aquaculture Practices) four-star oysters; the most sustainable oyster available.

Pacific has a large presence in and around Tillamook Bay where we farm over 800 acres of oyster beds. As you may know, our oysters live in the Bay and, as filter feeders, each oyster filters up to 50 gallons of water a day. Their flavor is dependent on the minerals and makeup of the water they filter. As a result, Pacific is highly attuned to the problems associated with the production of manure from the many farms located throughout the region.

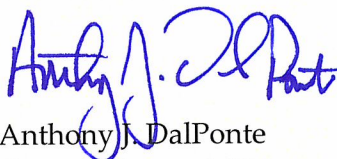
We encourage all efforts to improve responsible manure management. We believe that anaerobic digesters provide a sound means for processing manure responsibly and support DEQ's efforts to promote policies that encourage the development and use of digesters, particularly in and around Tillamook Bay.

Mr. Richard Whitman

1/22/19

Thank you for your work on this important effort. Please do not hesitate to contact my office if we can be of any further assistance.

Sincerely,



Anthony J. DalPonte

General Counsel / Director of Government Affairs

Pacific Seafood Group

503-905-4298

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