



OREGON
DEPARTMENT OF
AGRICULTURE



CAFO 2025 ANNUAL REPORT



INTRODUCTION

The mission of the Oregon Department of Agriculture (ODA) Natural Resources Division is to conserve, protect, and develop natural resources on public and private lands in order to ensure that agriculture will continue to be productive and economically viable in Oregon.

ODA Core Values:

We are proud to be AGGIES, embodying our mission and values to achieve our vision.

- » Approachable
- » Genuine
- » Growth-oriented
- » Inclusive
- » Experts
- » Sustainable

The 1989 Oregon Legislature established a regulatory program for Confined Animal Feeding Operations (CAFOs) to prevent manure pollution of water. The legislation required the Oregon Department of Environmental Quality (DEQ) to develop and issue CAFO permits and directed ODA to inspect CAFO facilities to ensure permit compliance. In 1993, the CAFO statutes were amended to direct the Environmental Quality Commission (EQC) and ODA to enter a formal Memorandum of Understanding (MOU) providing for ODA to administer the CAFO program.

The current CAFO Program MOU was signed on August 31, 2021, by the Director of ODA, Alexis Taylor, and the Director of DEQ on behalf of the EQC, Richard Whitman. The MOU will remain effective until December 31, 2026.

This report has been prepared as required by the MOU. The CAFO Program Annual Report describes the CAFO Program's activities that have occurred over the last year. The report includes:

- » Program statistics
- » CAFO inspection types and results
- » Enforcement actions
- » Administrative functions

CAFO Geographic Boundaries

Permitted CAFO facilities are located across the entire State of Oregon. The CAFO Program has divided the state into six areas to capitalize on geographic similarities, CAFO facility similarities, and equitable distribution of work responsibilities. Below is a map detailing the six CAFO areas. The number of permitted CAFO facilities by size in each area are shown in Table one and the number of permitted CAFO facilities by operation type in each area are shown in Table 2.

PROGRAM OVERVIEW

CAFO Program Staff

The program is led by the Water Quality Compliance Program Manager and has a total staffing level of 11 FTE. The CAFO Program consists of seven regional Livestock Water Quality Specialists (LWQS) with one position being a hybrid position that is half-time administrative process coordinator and half-time inspector. The LWQS are primarily responsible for assessing a facility's compliance with its CAFO permit. In addition to the LWQS, the CAFO Program has a Program Analyst, a Permit Coordinator and a Program Support staff position.

- » **Water Quality Compliance Program Manager:** Connie Landis (located at ODA, Salem)
- » **Area 1 - Tillamook County:** Armando Macias, Livestock Water Quality Specialist
- » **Area 2 - Benton, Clatsop, Columbia, Crook, Deschutes, Gilliam, Hood River, Jefferson, Lincoln, Polk, Sherman, Wasco, Washington, Wheeler, and Yamhill counties:** Charlene Olson, Livestock Water Quality Specialist
- » **Area 3 - Clackamas, Marion and Multnomah, counties and also covering Area 5 - Morrow and Umatilla counties:** Ben Krahn, Livestock Water Quality Specialist
- » **Area 4 - Coos, Curry, Douglas, Jackson, Josephine, Klamath, Lake, Lane, and Linn counties:** Chris Anderson, Livestock Water Quality Specialist
- » **Area 5 - Morrow and Umatilla counties:** vacant, Livestock Water Quality Specialist
- » **Area 6 - Baker, Grant, Harney, Malheur, Umatilla, Union, and Wallowa counties:** Hilary Collinsworth, Livestock Water Quality Specialist
- » **Hybrid Position:** Katie Kearney, Livestock Water Quality Specialist & Administrative Process Coordinator
- » **Program Analyst:** Christy Caldwell
- » **Program Support Staff:** Mackinzey Landry
- » **Permit Coordinator:** Kellen Parrish

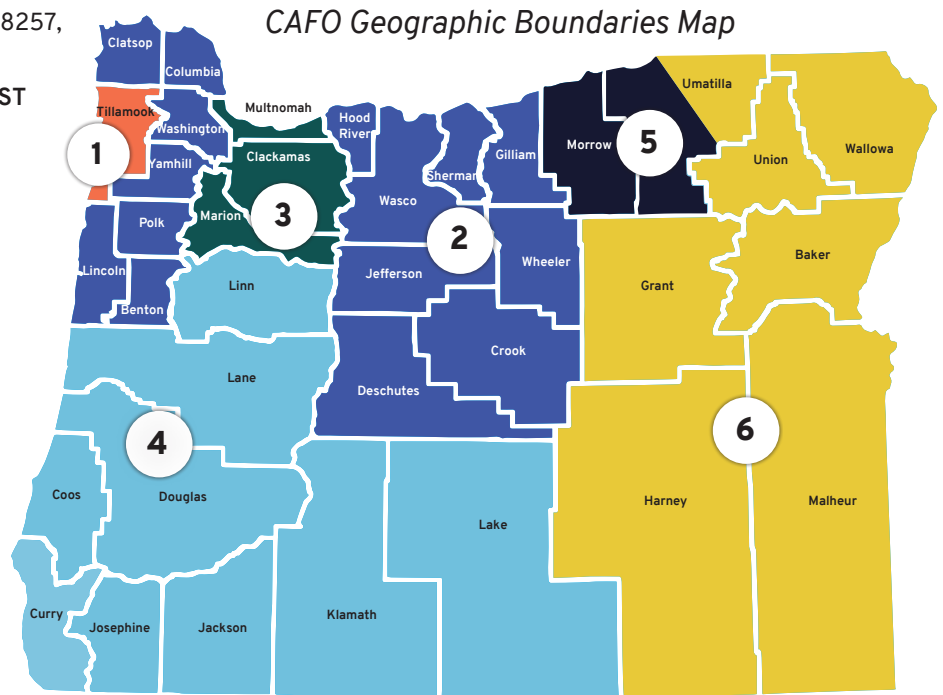


PROGRAM MANAGER: Connie Landis, 971.493.8257, connie.landis@oda.oregon.gov

AREA LIVESTOCK WATER QUALITY SPECIALIST

- 1** Armando Macias, 503.801.1630, armando.macias@oda.oregon.gov
- 2** Charlene Olson, 503.931-7778, charlene.olson@oda.oregon.gov
- 3** Ben Krahn, 503.510.8213, ben.krahn@oda.oregon.gov
- 4** Chris Anderson, 541.660.9611, christopher.anderson@oda.oregon.gov
- 5** Vacant; currently covered by Ben Krahn
- 6** Hilary Collinsworth, 541.881.6020, hilary.collinsworth@oda.oregon.gov

HYBRID POSITION: Katie Kearney, 971.707.8386, katie.kearney@oda.oregon.gov



CAFO PROGRAM STATISTICS

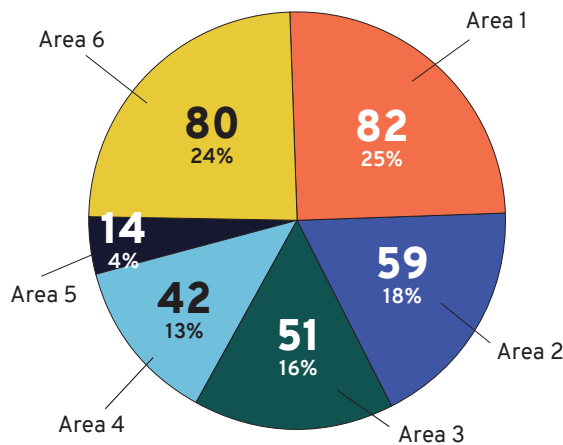
Together, ODA and DEQ issued the Oregon CAFO National Pollutant Discharge Elimination System (NPDES) General Permit #01-2016. This permit became effective on April 20, 2016, and expired February 28, 2021. The permit is administratively extended until a new permit is approved.

On October 1, 2015, ODA and DEQ issued the Oregon CAFO Water Pollution Control Facilities (WPCF) General Permit #01-2015. This permit became effective on October 21, 2015 and expired September 30, 2025. The permit is administratively extended until a new permit is approved. In addition to the General Permit, ODA and DEQ also administer Individual NPDES and WPCF Permits.

On December 31, 2025, the CAFO Program had a total of 473 permitted CAFO facilities. Of the permits issued:

- » 328 CAFO facilities are registered to the General NPDES Permit.
- » 3 CAFO facilities are registered to Individual NPDES Permits.
- » 142 CAFO facilities are registered to the General WPCF Permit.

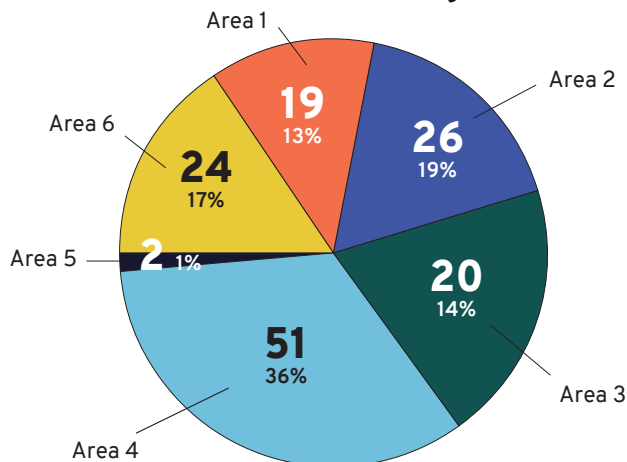
328 NPDES General Permit Registrations



3 Individual NPDES Permits



142 WPCF General Permit Registrations



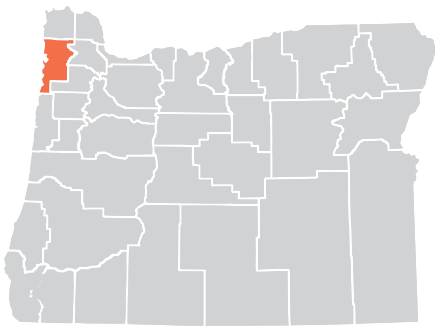
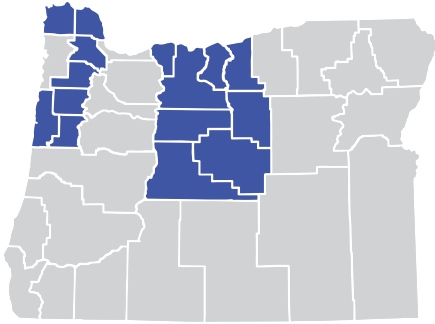
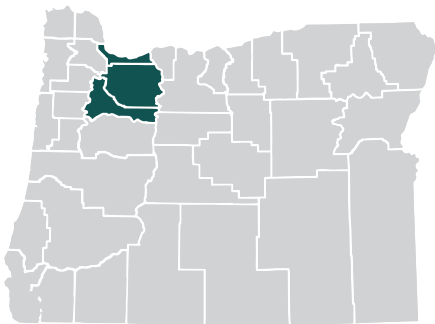


Table 1: CAFO Permit Type by Area and Designation

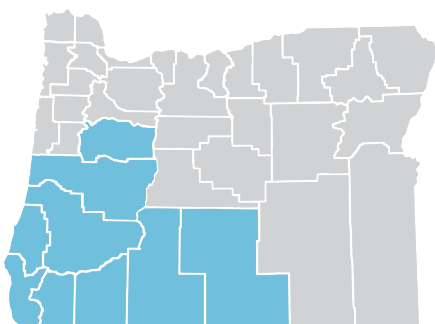
Area 1	NPDES General Permit Registrations	Individual Permits	WPCF General Permit Registrations	Total
TOTAL	82	0	19	101
Large Tier 2	1	0	0	1
Large Tier 1	11	0	0	11
Medium	47	0	6	53
Small	23	0	13	36



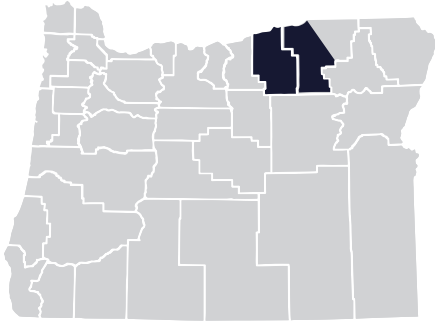
Area 2	NPDES General Permit Registrations	Individual Permits	WPCF General Permit Registrations	Total
TOTAL	59	0	26	85
Large Tier 2	6	0	2	8
Large Tier 1	14	0	2	16
Medium	24	0	7	31
Small	15	0	15	30



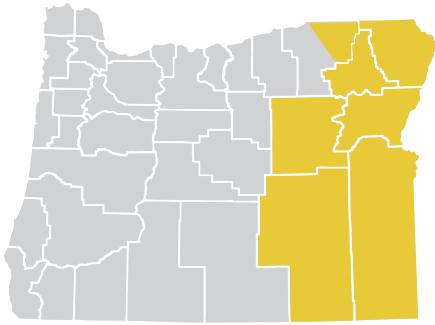
Area 3	NPDES General Permit Registrations	Individual Permits	WPCF General Permit Registrations	Total
TOTAL	51	0	20	71
Large Tier 2	5	0	0	5
Large Tier 1	10	0	1	11
Medium	19	0	5	24
Small	17	0	14	31



Area 4	NPDES General Permit Registrations	Individual Permits	WPCF General Permit Registrations	Total
TOTAL	42	0	51	93
Large Tier 2	4	0	2	6
Large Tier 1	14	0	7	21
Medium	14	0	14	28
Small	10	0	28	38



Area 5	NPDES General Permit Registrations	Individual Permits	WPCF General Permit Registrations	Total
TOTAL	14	3	2	19
Large Tier 2 Individual	0	1	0	1
Large Tier 1 Individual	0	2	0	2
Large Tier 2	10	0	0	10
Large Tier 1	1	0	1	2
Medium	2	0	0	3
Small	1	0	1	2



Area 6	NPDES General Permit Registrations	Individual Permits	WPCF General Permit Registrations	Total
TOTAL	80	0	24	104
Large Tier 2	9	0	2	11
Large Tier 1	19	0	5	23
Medium	45	0	13	58
Small	7	0	4	11



Table 2: NAICS (North American Industry Classification System) by Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Total
Auction Yard	0	1	0	2	0	1	4
Beef Cattle Ranching and Farming, Backgrounding Cattle, Veal Calf Production	0	5	6	16	1	10	38
Broiler Chicken Production	0	9	7	8	1	0	25
Cattle Feedlots, Fattening Cattle	9	19	3	16	9	72	128
Chicken Egg Production	0	2	8	3	1	0	14
Dairy Cattle and Milk Production	92	39	37	35	6	14	223
Fur-Bearing Animal and Rabbit Production (includes mink, chinchilla, and fox)	0	0	4	1	0	0	5
Goat Farming (e.g., meat, milk, mohair production)	0	2	0	3	0	3	8
Hog and Pig Farming	0	4	3	1	0	1	9
Horses and Other Equine Production (includes burro, donkey, mule, and pony)	0	1	1	1	0	1	4
Nature Parks and Other Similar Institutions	0	0	0	1	0	0	1
Other Poultry Production	0	0	0	0	0	0	0
Sheep and Lambs	0	1	0	2	1	2	6
All Other Animal Production (includes dog kennels, alpaca, bison, and llama production)	0	2	2	4	0	0	8
Total	101	85	71	93	19	104	473

2025 CAFO INSPECTIONS

Inspection Type

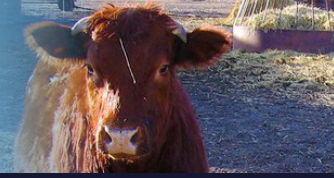
The CAFO Program conducts multiple types of inspections on permitted and non-permitted facilities. Most of the inspections conducted are routine inspections of permitted facilities. Routine inspections are used to assess the facility’s compliance with permit conditions and state water quality laws. Routine inspections are conducted on a 10-month rotational schedule.

In 2025, CAFO Program staff completed 637 inspections on permitted and non-permitted operations, with 497 of those being routine inspections on permitted operations.

Five complaints were received in 2025, four of which resulted in complaint inspections (CI) with various outcomes. The complaint not resulting in an inspection was transferred to the ODA Agricultural Water Quality Program to be addressed through their compliance program process.

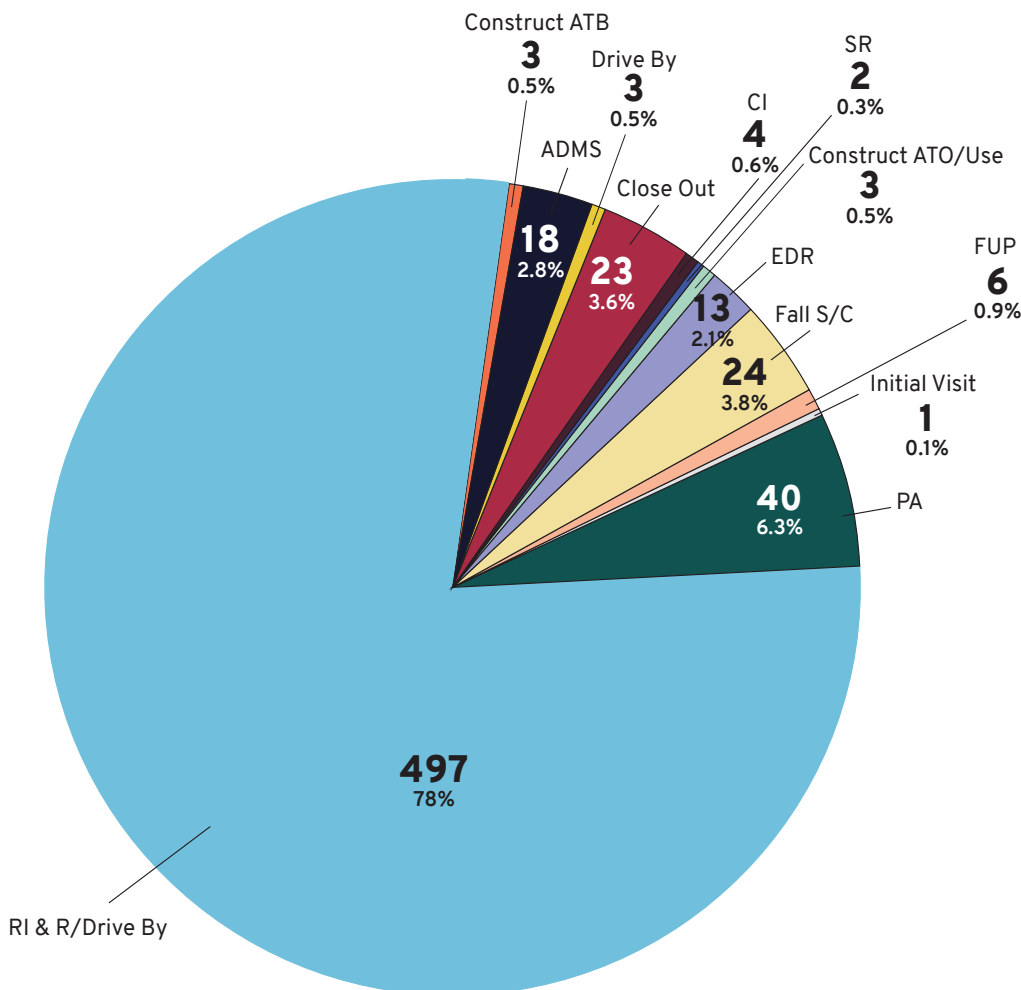
A list, and descriptions, of the types of inspections conducted by the CAFO Program follows. The following pie chart also provides a summary of the number of inspections, by type, completed during 2025.

- » **Administrative (ADMS):** Business transaction completed in the office.
- » **Close Out:** A final facility inspection conducted to assess if the permitted facility is appropriately prepared to prevent discharge during a permit transfer or permit cancellation.
- » **Complaint (CI):** Complaint investigation for water quality concerns on permitted and non-permitted animal agriculture facilities.
- » **Complaint Follow-up (CFUP):** Follow-up inspection to a complaint investigation for water quality concerns to determine whether a facility found to be in violation during a prior compliant inspection is now in compliance with the terms of their permit.
- » **Construction Inspection Approval to Build (Construct ATB):** Construction Approval Request (CAR) and design package received. Operator approved/conditionally approved to start construction. Letter from ODA must be received before construction starts.
- » **Construction Inspection Approval to Occupy/Use (Construct ATO/Use):** Construction complete, according to design package, approval/conditional approval to occupy/use facility.



- » **Drive By:** A visual inspection of a facility (permitted or non-permitted) from public access. Contact is not typically made with landowner of the facility. Typically used when the program receives a complaint. The drive-by allows for a quick assessment to determine next steps.
- » **Educational Review (EDR):** Requested by permitted CAFO operators, LWQS discusses performance standards and best management practices for enabling producers to attain permit compliance. LWQS may also evaluate new proposals from producers. An EDR is not a formal inspection and generally will not result in enforcement action.
- » **EPA/ODA Joint Compliance Inspections (EPA):** Program compliance inspections led by EPA.
- » **Fall Storage Check (Fall S/C):** Inspect liquid and solid storage to ensure sufficient winter storage capacity.
- » **Follow-up (FUP):** Follow-up inspections are performed to determine whether a facility found to be in violation during a prior inspection is now in compliance with the terms of their permit.
- » **Initial Visit:** This is the first on-site meeting with a potential CAFO operator.
- » **Planning Assistance (PA):** LWQS provides planning and technical assistance designed to increase client awareness of pollution prevention practices and innovative technologies to enhance their environmental performance and maintain Permit compliance.
- » **Routine (RI):** An announced regular, routine inspection on a scheduled frequency determined by overall program resources and workload, number of facilities, and size of inspection staff.
- » **Routine Drive By - (R/Drive by):** Scheduled inspections done due to circumstances that person-to-person or person-to-animal contact is a risk.
- » **Self-Reported Discharge (SR):** CAFO operator reports a discharge to surface water.

Total Number of Inspections by Type (permitted and non-permitted facilities)





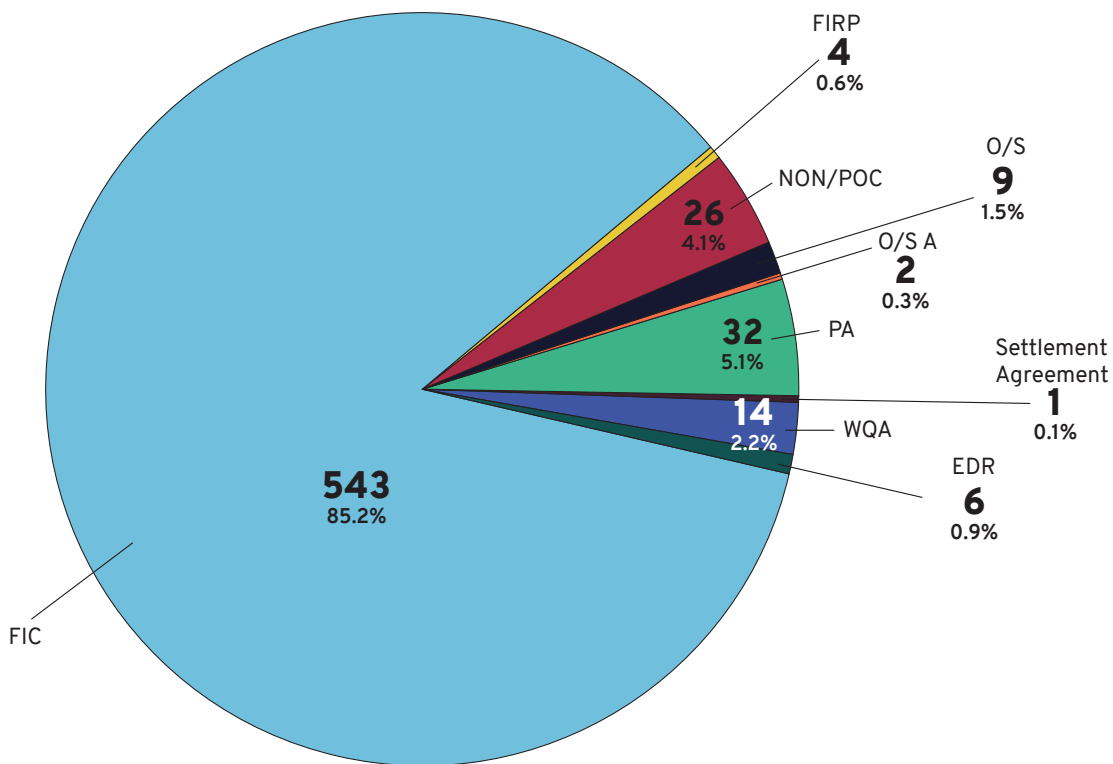
Inspection Outcome

During the closing conference of each inspection, an inspection result is issued. An inspection report form is completed and records compliance, or noncompliance, with permit conditions or state water quality laws or rules. Inspection results may be delivered after ODA receives results of sampling, confirms data, and/or confers with management on matters identified during the inspection.

Below is a list and descriptions of the inspection outcomes used by the CAFO Program. The following pie chart provides a summary of the inspection outcomes reported during CY 25.

- » **Educational Review (EDR):** Educational review was completed.
- » **Facility in Compliance (FIC):** The permittee operated in compliance with their permit, state water quality law or rule.
- » **Final Inspection Result Pending (FIRP):** Additional time needed to assess the full extent of an inspection. This result is often issued if samples have been collected and results are needed before a conclusion can be issued.
- » **Notice of Noncompliance/Plan of Correction (NON/POC):** See 2025 CAFO Enforcement Activities - Formal Enforcement Actions, below.
- » **Notice of Assessment of Civil Penalty (NACP):** See 2025 Enforcement Activities - Formal Enforcement Actions, below.
- » **On-Schedule (O/S):** The owner/operator is completing the step-by-step required actions (RAs) of their compliance schedule and is currently on schedule with all RAs.
- » **On-Schedule (O/S) A:** On-schedule Written
- » **On-Schedule (O/S) B:** On-Schedule Verbal
- » **Planning Assistance (PA):** LWQS provided both planning and technical assistance to prepare and submit required Nutrient Management Plan (NMP), reports, or applications.
- » **Settlement Agreement:** A settlement agreement is a legally binding contract that resolves a dispute between parties without going to court or proceeding to a full trial. It outlines agreed-upon terms, in exchange for releasing all liability and waiving the right to future legal claims.
- » **Water Quality Advisory (WQA):** The permittee was in compliance during the inspection event, however, potential problems were noted, and voluntary efforts were encouraged to prevent future permit violations.

Inspection Outcomes (Total all Permitted and Non-Permitted Facility Inspections)¹



¹ Also includes facilities in the process of applying for permit coverage.



Dam Safety Inspections

In 2011, ODA entered a MOU with the Oregon Water Resources Department (OWRD) that allows the CAFO Program to conduct dam safety inspections on statutory dams (as defined by ORS 540.340 through 540.400) during CAFO inspections. OWRD completed rulemaking that includes the dam safety program, and the agencies updated and signed a new Internal Agency Agreement (IAA) on July 6, 2020. The 2020 IAA is in effect until June 30, 2030.

Statutory dams on CAFOs are manure lagoons that have an earthen embankment of 10 feet or higher and have a storage capacity of equal to, or greater than, 9.2 acre-feet.

Of the 473 permitted CAFO facilities, there are 34 earthen manure lagoons that meet the definition of a statutory dam. Each of these manure lagoons statutory dam(s) is classified as a "low hazard" by the OWRD. According to the IAA with OWRD, inspections for low hazard dams need to be conducted at least once every six years. However, the program aims to inspect these dams during normal routine inspections that occur every 10 months. ODA provides an annual report of dam safety inspections completed to OWRD.

Key Performance Metric

The CAFO Program has a legislatively established Key Performance Metric (KPM). The CAFO Program tracks and reports the percent of permitted CAFOs found to be in compliance with their permit during routine inspections for each calendar year.

A total of 497 routine inspections were completed on permitted CAFOs in 2025. Program staff use a progressive compliance approach and assist permit holders with practical solutions to problems whenever possible. Additional technical assistance and outreach is done to assist producers with planning assistance and education on best management practices enabling producers to maintain permit compliance.

For all routine inspections completed during 2025, **99.20%** of outcomes were facilities in compliance with permit conditions.

2025 ENFORCEMENT ACTIVITIES

Formal Enforcement Actions

If a discharge occurs or violation has been identified and the CAFO operator fails to complete corrective action(s) as required, the CAFO Program does take enforcement actions. Formal enforcement actions include, but are not limited to, Notice of Noncompliance/Plan of Correction (NON/POC), and Notice of Assessment of Civil Penalty (NACP).

Other Enforcement Actions

Following the issuance of a NACP, the CAFO operator may choose to file an appeal and to request an informal meeting to discuss the enforcement action or complete a Contested Case Hearing. At the conclusion of the process, they will receive a Final Order or a Final Order Incorporating Settlement Agreement.

S4.E Order on Permit Modification

The Permit directs ODA to consider a permit modification when a facility has more than two discharges in any 24-month period. ODA also may issue a permit modification for facilities that are experiencing difficulty maintaining Permit compliance.

2025 ADMINISTRATIVE ACTIVITIES

In addition to conducting field inspections, the CAFO Program staff performs several administrative functions.

Review and Approval of Nutrient Management Plans

The largest ongoing administrative function performed by the CAFO Program includes the review and approval of the NMP. The NMP is a document unique to the CAFO facility that describes the CAFO's manure production, storage, transfer, and application activities. Every permitted CAFO must implement an ODA-approved NMP. The approved NMP is incorporated into the CAFO permit by reference in section S3.A. of the permit.

Every NMP submitted to the CAFO Program is reviewed to ensure that it meets the required NMP Elements S3.C. of the permit. In certain circumstances, the NMP may require public notice as described in S3.B. of the permit. Public noticing does add additional time to the NMP approval process.

Once the NMP has been approved, the LWQS reviews the NMP before inspections to ensure that the NMP still reflects the CAFO's operation and maintenance. If there is a discrepancy between the operation and maintenance of the CAFO and the NMP, the LWQS will work with operators to update the NMP and ensure that it reflects current activities of the CAFO while being in compliance with the required NMP elements.

Review and Approval of Manure Storage Facilities

The second-most common administrative function performed by the LWQS pertains to construction of manure storage facilities. New construction or modification of existing manure storage facilities must be approved in advance as described in section S2.E.2. of the permit.



Cancellation of CAFO Permits

In 2025, the program cancelled 31 registrations to CAFO permits. The majority of the permits cancelled were for dairy CAFOs.

The primary reason CAFO permits were cancelled was because the facility was sold or leased to a new CAFO operator. Subsequently, the permit must be transferred to

the new owner or operator and the permit registration is cancelled for the previous owner or operator. The second most common reason a CAFO permit was cancelled was because the facility no longer met the definition for requiring a CAFO permit. In this case, the operator sold the animals and/or the facility and the operator was no longer going to use or maintain the waste systems on the farm.

Table 3: Number of CAFO Permits Cancelled by NAICS Code and Area

NAICS Code	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Total
Beef Cattle Ranching and Farming, Backgrounding Cattle, Veal Calf Production	0	0	0	2	0	0	2
Broiler Chicken Production	0	1	1	1	0	0	3
Cattle Feedlots, Fattening Cattle	0	1	2	1	1	1	6
Chicken egg production	0	1	1	0	0	0	2
Dairy Cattle and Milk Production	3	1	3	4	1	0	12
Fur-Bearing Animal and Rabbit Production (includes Mink, chinchilla, and fox)	0	0	1	0	0	0	1
Goat Farming (e.g., meat, milk, mohair production)	0	0	1	0	0	0	1
Hog and Pig Farming	0	0	1	0	0	0	1
Sheep and Lambs	0	1	0	0	0	0	1
All Other Animal Production (includes dog kennels, alpaca, bison, and llama production)	0	0	0	2	0	0	2
Total	3	5	10	10	2	1	31

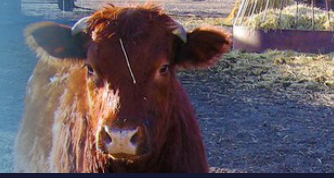
CAFO Permit Registrations Issued

A total of 25 CAFO permit registrations were issued in 2025. There were 14 CAFO permit registration transfers

of a permit from a previously permitted operator, eight were new WPCF Permit registrations, two were change of permit type and one was for an expanding facility.

Table 4: Number of CAFO Permit Registrations Issued by NAICS Code and Area for 2025 CY

NAICS Code	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Total
Beef Cattle Ranching and Farming, Backgrounding Cattle, Veal Calf Production	0	0	0	0	2	0	2
Broiler Chicken Production	0	0	1	1	1	0	3
Cattle Feedlots, Fattening Cattle	0	2	0	1	0	1	4
Chicken Egg Production	0	1	0	1	0	0	2
Dairy Cattle and Milk Production	3	2	4	2	0	1	12
Goat Farming (e.g., meat, milk, mohair production)	0	1	0	0	0	0	1
Sheep and Lambs	0	1	0	0	0	0	1
Total	3	7	5	5	3	2	25



Civil Penalty Fund Grant Agreements Administered

When the CAFO Program issues a NACP, the money received from these activities is placed into an account to be used for educational and technical assistance projects supportive of CAFO operators. Funds are awarded through a grant agreement process.

2025 CAFO Individual Permit Development Activities

The program staff were involved with development of one, CAFO NPDES Individual Permit and related materials in 2025. Individual Permits are jointly developed by ODA and DEQ staff. These permits require a multi-agency coordination with Oregon Department of State Lands (DSL), Oregon Health Authority (OHA), Oregon Department of Fish and Wildlife (ODFW) and OWRD, DEQ, and ODA. Consultations on both technical and policy questions occur during development of these permits. All Individual Permits require Public Notice and a hearing.

2025 CAFO General Permit Renewal Activities

The CAFO NPDES Permit #01-2016 expired on February 28, 2021. On September 25, 2020, CAFO NPDES Permit Renewal forms were mailed to all permittees registered to the CAFO NPDES Permit. ODA and DEQ developed and reviewed General Permit drafts in preparation for issuing a new CAFO NPDES General Permit in 2022. Since that time the process has been delayed in order to evaluate challenges facing other northwest state permits and to prioritize the implementation of Senate Bill 85 (2023).

Program staff worked with DEQ on the CAFO NPDES General Permit throughout 2025, the permit went to public notice in November, and a public hearing was held in December. The permit and response to comments are expected in spring of 2026.

The CAFO WPCF General Permit #01-2015 expired on September 30, 2025. Renewal notices for facilities on this permit were received before the permit expired. Once the NPDES General Permit is issued, work on the WPCF General Permit will start.

Water Supply Plans

CAFO facilities registered to the WPCF General Permit were required to submit a Water Supply Plan (WSP) with their 2025 renewal paperwork (NPDES-registered facilities will submit WSPs in 2026). The WSP allows ODA and OWRD to ensure that legal water sources are adequately available for the CAFO to utilize in compliance with permit conditions and state water law. The three basic components of the WSP are Irrigation Water, Agricultural Commercial/Industrial Water,

and Stockwater. LWQs and the Program Manager review the WSPs before they are submitted to OWRD. Once the WSPs are received back from OWRD, operators receive an email containing their signed WSP indicating the water uses that were deemed legally authorized and allowable as well as any updated information (e.g., clarified certificate, permit, registration, or claim numbers) or instructions (e.g., how to get a well ID tag) provided by OWRD.

CAFO Advisory Committee

Each year the CAFO Program holds three regularly scheduled CAFO Advisory Committee (CAC) meetings. The CAC was created to provide feedback to the department about the CAFO Program. The membership of the committee is comprised of permitted CAFO operators, technical advisors, stakeholder representatives, and the public. Meeting agendas and minutes can be found at <https://oda.direct/meetings>.

CAFO Program Activities Specific to GWMA

There are permitted CAFOs in each of the three, DEQ-established Groundwater Management Areas (GWMA).

ODA and DEQ are reviewing all new CAFO permits to ensure harmonization on land application activities and other similar permit conditions.

LUBGWMA Committees

LWQS Ben Krahn and the Program Manager serve on various interagency (ODA, DEQ, OWRD) committees focused on groundwater nitrate concentrations in the Lower Umatilla Basin Groundwater Management Area (LUBGWMA). The LUBGWMA state agency staff coordination meetings and agronomic rate committee meetings are each held virtually on a monthly basis and the technical workgroup meets in-person quarterly. These three agencies and OHA all contributed to the annual Oregon Nitrate Reduction Plan for the LUBGWMA available at <https://oda.fyi/Nitrate-Reduction-Plan>.

HPAI Response Mortality Composting Planning Efforts

LWQS Christopher Anderson worked with the ODA Animal Health Program and poultry CAFO operators on facility-specific plans for composting birds if a flock becomes infected with Highly Pathogenic Avian Influenza. This involves looking at a map of each CAFO and identifying the best option(s) for siting compost piles given the permitted number of birds (the location must be large enough to build compost windrows that meet USDA Livestock Mortality Composting Protocol standards), slope, soil composition, and proximity to surface and ground water.