

August 18, 2026

Director Brian Baldrige,

The Concentrated Animal Feeding Facility Advisory Committee (CAFF Committee) respectfully submits the following recommendations to support the Ohio Department of Agriculture (ODA) in strengthening the administration, compliance, and long-term integrity of the CAFF program. These recommendations reflect recurring challenges raised by the Division of Livestock Environmental Permitting (DLEP), including resource constraints, permit compliance issues, and areas for improvement in manure management education. While not exhaustive, these recommendations represent areas where the Committee reached broad agreement on practical, near-term actions ODA can take to improve program effectiveness, support regulated entities, and protect Ohio's water resources.

1. Consideration of operational procedures:

- *Provide DLEP **additional resources** to fulfill statutory authority obligations. Permitted CAFFs have increased by almost 50% since 2015, and no additional staffing has been provided.*
 - ODA should urge the legislature to appropriate additional funding and resources to DLEP to fulfill the obligations currently authorized.
 - Within scope of duties, ODA Director has ability to direct allotted funding (within biennial budget line items) to support operations.
 - While completing the current obligations, the lack of financial and human resources to adequately fulfill permit requests, permit compliance, and enforcement, the regulated community supports this approach.
 - Permit applications review times are long due to lack of human resources to complete.
 - Permit applications should be completed with an online system to compile and document all data related to permits. An online system does not replace human interaction with permit review, only enhances the collection, retention, and tracking of information.
 - Public documents should be available, at-will, in a public facing, online portal. This could help reduce staff time ODA spends on responding to public records requests.

2. Encourage Soil & Water Conservation Districts to implement education programs and dissemination of information procedures for manure management.

Primary Audience: ALL livestock producers (size, permit authority, species, site, etc.)

Primary Adjacent Audience: SWCD Boards (Governing Bodies of SWCD staff and programs)

Secondary Audience: Crop producers/farmers as cooperating entities

- Fund and task all SWCD boards and staff to disseminate the importance of Nutrient Management Plans (NMP) to fulfill mission of SWCD.
 - Focus of NMP: address pollution abatement, best management practices for water and soil quality, as well as overall livestock management.
 - Identify useful and applicable best management practices that enhance health of livestock, economic viability of operation, and overall environmental quality.
 - Negate issues with co-mingling sources, compounding application to same geographic area, and no viable records management for manure application for any sized AFF.
- Encourage all SWCD staff to disseminate research-based information to develop NMP.
- Encourage cooperative education approach with Extension systems to access, deliver, and evaluate unbiased, research-based information in appropriate educational avenues to livestock producers.
- Increase funding for the expansion of H2Ohio.

Respectfully,

CAFF Advisory Committee