

Jeremy Tejrjian and the Marin County Board of Supervisors
3501 Civic Center Drive
San Rafael, CA 94903

March 9, 2017

Re: Slaughter in Marin County

Dear Mr. Tejrjian and Supervisors Connolly, Rice, Sears, Rodoni, and Arnold:

The undersigned organizations strongly urge that Marin County **keep in place its longstanding ban on slaughter in the county**. We represent constituents who are deeply concerned about the risks slaughter poses to our county in three broad areas:

Environment: Animal slaughter is one of the nation's largest water polluters, carries high greenhouse gas emission costs, and is poorly suited for sensitive watershed, wetland, and riparian regions.

Economy: Animal slaughter adversely affects property values and tourism appeal. It would also place an unjust burden of new infrastructure costs on Marin residents as roads, social services, and enforcement agencies become taxed.

Quality of Life: Animal slaughter creates noise pollution, odor pollution, additional industrial traffic and the risk of increased violent crime as well as grisly sights that all take a negative toll on Marin residents and visitors.

We already have precedent and it's bad: Neighbors of a ranch in Nicasio that conducts slaughter for personal consumption have repeatedly asked the county for help in mitigating the negative impacts of that operation and, so far, the County has not been able to effectively intercede. How will it address problems from widespread and larger-scale slaughter operations?

Marin's own Countywide Plan endorses minimizing or eliminating potential hazards at the onset of an activity instead of determining an "acceptable level of harm." Our Comprehensive Economic Development Strategy specifically says that industries that lead to environmental imbalance are not good target industries.

Slaughter in the county is *unnecessary*. Under the current slaughter ban Marin agriculture is thriving. Its production value has increased 160% indexed to 2007 and 10% between 2014 and 2015 alone.

The ban on slaughter in Marin is a win-win. Farms and ranches will continue to thrive while Marin residents will be protected from threats to our environment, economy, and quality of life. We call upon you to study the supporting information below and to keep Marin County's ban on slaughter.

Citizens Against Marin Slaughter
Marin County, CA

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Turtle Island Restoration Network
Olema, CA

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The Climate Friendly Agricultural
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The case against animal slaughter in Marin

Fewer than 1% of Marin households would benefit. Marin County farm and ranch owners represent less than 1% of Marin households, per U.S. Census Bureau household data and UC Cooperative Extension¹ farm data. Agriculture in Marin remains a minute part of our local economy, contributing around \$111 million in 2015 -- less than 1%. Likewise, the number of jobs generated by agriculture in Marin account for just .26% of all Marin jobs, per the Marin Economic Forum's 2016 Economic Bulletin.² Yet slaughter operations implemented by this small industry would harm residents countywide who are the majority voice and taxpaying base. They would be asked to shoulder the burden of tangible and financial impacts of slaughter detailed below. Allowing slaughter in Marin risks far more than it could ever benefit.

Unnecessary for a thriving industry: Despite being a small portion of Marin's constituency, workforce, and economy, farms and ranches in Marin are experiencing rapid financial growth without slaughter. The 2015 Marin County Livestock and Crop Report³ shows 10% growth between 2014 and 2015. And indexed against 2007 now stand 160% higher. There's no reason to believe this will change. Farms and ranches will continue to grow robustly, the bucolic and peaceful surroundings that attract residents and tourists alike will be preserved, and sustainability goals will be balanced by keeping the ban on slaughter in the county.

The Precautionary Principle: When considering slaughter in the County, we urge officials to turn to our own Marin Countywide Plan (CWP)⁴, which states:

"The precautionary principle, another conceptual framework considered during the preparation of the Plan, carries the sense of foresight and preparation, and is the common-sense idea behind many adages: "Be careful." "Better safe than sorry." "Look before you leap." "First, do no harm." Historically, many environmentally harmful activities were stopped only after they resulted in environmental degradation or serious harm to many people. **The precautionary principle is an approach characterized by minimizing or eliminating potential hazards at the onset of an activity** instead of the approach that determines an "acceptable level of harm." In addition, the precautionary principle utilizes full cost accounting to assess the potential costs and benefits of a given activity or product."⁵

Barring slaughter operations before they begin again, instead of later, after problems have arisen, will allow us to fully support our three E's from the CWP -- environment, economy, and equity.

These slaughter amendments would be just the start. The Planning Commission recognized the outpouring of opposition to slaughter in Marin by removing from their recommendation rabbit slaughter in small-scale facilities, slaughter in ARP zones, and full scale slaughter and rendering plants. But their January 23rd discussions underscored that these were moves only meant to ensure slaughter passes initially at the Board of Supervisors before likely being expanded:

"I think there's also some issue of, there's going to be resistance to this at the Board of Supervisors hearing and we want to have this be successful and get under way, and look at that [full scale slaughterhouses and rendering plants] as another level of change if there's something that really makes sense."

¹ <http://ucanr.edu/sites/uccemarin/files/30457.pdf>

² http://www.marineconomicforum.org/report/2016/ECONOMIC_BULLETIN_Fall_2016_%20Final.pdf

³ <http://www.marincounty.org/~media/files/departments/ag/crop-reports/2015.pdf?la=en>

⁴ <http://bit.ly/2m4o0Bj>

⁵ <http://bit.ly/2m4o0Bj>

Commissioner David Paoli

*"I would agree. We're trying to devise a start, to help agriculture in the county. And we don't even know whether this will be successful, what we've decided on already. But we hope it will be. We can always come back if the need is there and address it and change it and maybe expand it if it looks like it's necessary."*⁶

Commissioner Peter Theran

There is ultimately no such thing as small-scale slaughter. The Niche Meat Processors Network (which provides resources to small-scale slaughter facilities) says robust traffic is necessary for a small plant to be profitable:

*"...the processor must have significant, sustained demand for processing services: enough farmers and ranchers who commit to bringing enough livestock, consistently over the year... Throughput, revenue, and services offered are all interconnected: the more throughput, the more revenue. The more revenue, the more (and more sophisticated) services a processor can provide."*⁷

The higher the throughput, the greater the detriment to Marin residents and the environment.

Marin slaughter precedent exists, and it's bad. Already in Marin County, with the ban in place, Marin residents have been suffering the adverse effects of animal slaughter from a local ranch slaughtering for personal consumption.

The Nicasio Land Owners Association wrote the Planning Commission that, "...large numbers of rabbits were being slaughtered and the fur, heads, ears, and other unused body parts were disposed of by being dumped on hillsides on the property, from where they were picked up by birds and dropped on neighboring properties, in fields and water tanks."⁸

Marin resident and cow/calf rancher Paulette Percy wrote,

*"I am a witness to and have felt the effect that inappropriate slaughtering of rabbits and sheep in close proximity to my property and home did in fact change the normal flow of predators that support our eco system. The hawks moved out and the buzzards and crows moved in. Coyotes changed their normal trails; farrow dogs found food and water sources were polluted."*⁹

The county has been unable to deliver relief in this isolated situation. How can residents have faith there will be assistance when commercial slaughter is widespread and permitted?

Suburbs and slaughter don't mix. Marin County is officially designated a suburban community. While its residents support local agriculture and the preservation of farmland, slaughter operations of any kind are not a good fit for this type of designation. A Food and Agricultural Organization of the United Nations (FAO) review of poultry production and the environment says that slaughter is especially ill-suited to urban and peri-urban areas in that it: "increases the risk of environmental impacts: first, because slaughterhouses often lack the land required to setup waste-management facilities; second, because the pollutants that are emitted add to those emitted by other human

⁶ http://marin.granicus.com/MediaPlayer.php?view_id=3&clip_id=8386

⁷ http://www.nichemeatprocessing.org/wp-content/uploads/2016/08/CrashCourseThree.Final_revised_8.31.pdf

⁸ <http://bit.ly/2lIdAf2>

⁹ <http://bit.ly/2lI3xqw>

activities; and third, because neighbouring communities are directly affected by surface-water and groundwater contamination.”¹⁰

Not every community that raises animals is suited to slaughter them. Marin’s emphasis on sustainability, small agricultural lot sizes, and residential population underscore this.

The juxtaposition of slaughter activities with suburban and urban areas has a well demonstrated history of conflict. As reported by NBC and Law360, Black Earth Meats, a small-scale organic slaughterhouse in Wisconsin, scaled up its business over the years -- and the public was subjected to noise, odor, traffic, waste, escaped animals, and other issues. With no other solutions in sight, the town threatened to sue the slaughterhouse.¹¹ The slaughterhouse then sued the town, claiming a violation of due process and equal protection.¹²

As Marin residents, we don’t want to spend taxpayer money on fighting an industry that should have never been let in our suburban community in the first place.

Slaughter is bad for property values. The winter 2015 edition of *The Appraisal Journal* reports that residences near animal operations, including slaughter operations, are significantly impacted. Nearby properties suffer a valuation impact of up to 26%; adjacent properties suffer an impact of up to 88%.¹³ West Marin real estate expert Cindy Shelton of Decker Bullock Sotheby’s International Realty spoke on behalf of the Marin County Realtors Association at the November 28 Planning Commission, saying that slaughter “would be a real estate nightmare, as far as disclosures go.”¹⁴

A suburban Ohio resident learned firsthand what Marin would be in for when slaughter came to her neighborhood. Sheli Pershing told the *Columbus Dispatch*, “It has completely taken away my quality of life and the enjoyment of my home... The smell has been horrendous at times. I can’t even sleep with my windows open.”¹⁵ Indeed, the noxious odors, noise pollution, and grisly sights are just some of the reasons why slaughter is so poorly suited for suburban areas and has a detrimental impact on economic interests.

Even some of our agricultural operators understand the risk. Rancher Paulette Percy of Nicasio wrote to the Planning Manager and Planning Commission, “Slaughter proposals of livestock large or small will impact neighbor’s peace, the environment, and real estate values. I would be concerned the county would not be in a position to oversee and enforce adequate protocol or be available for immediate inspection.”¹⁶

Slaughter is bad for tourism. If people don’t want to live by slaughter they certainly don’t want to vacation by it. Marin contains many communities that are dependent on tourism thanks to their natural beauty. A quick glance at the image of our county offered the world by the Marin Convention and Visitor’s Bureau shows clean, bucolic lands and evolved local culture.¹⁷ In 2011 that image brought in \$620 million of tourism according to the bureau,¹⁸ and at the end of 2015 Marin launched an ambitious strategy to increase tourism revenue by 10% annually in our Comprehensive Economic Development Strategy (CEDS).

¹⁰ http://www.fao.org/ag/againfo/home/events/bangkok2007/docs/part2/2_2.pdf

¹¹ <http://www.nbc15.com/home/headlines/Organic-meat-processor-to-close-after-dispute-268223672.html>

¹² <http://www.law360.com/articles/832538/7th-circ-scrap-shuttered-slaughterhouse-s-beef-with-town>

¹³ http://www.myappraisalinstitute.org/webpac/pdf/TAJ2015/TAJ_WI15_p041-050_Feat3-AnimalOperations.pdf

¹⁴ <http://www.marinij.com/general-news/20161128/marin-factions-on-animal-slaughter-ban-battle-to-sway-commission>

¹⁵ <http://www.dispatch.com/content/stories/local/2016/09/09/Brown-Township-slaughterhouse-dispute.html>

¹⁶ <http://bit.ly/2n4jORW>

¹⁷ <https://visitmarin.org/media/marin-photo-gallery/>

¹⁸ <https://www.visitmarin.org/media/annual-reports/>

The Bureau’s tag line, “It’s different here. And not by accident”¹⁹ is a fitting one to remind us that animal slaughter does not fit in Marin.

Infrastructure must benefit sustainability. Marin’s Comprehensive Economic Development Strategy (CEDS) plan states, “There are infrastructure needs to access and support those that come to Marin County to do business with local farmers and ranchers, but also to access our wetlands, coastlines, and other preserved spaces that draw visitors. Open-space preservation and destination management strategies are connected; infrastructure that benefits one aspect of the economy must benefit the sustainability of Marin County’s natural resources.”²⁰ Lifting Marin County’s slaughter ban is not in keeping with a balance between slaughter and the larger economies of tourism, real estate... and the priceless value on the sustainability of Marin’s natural resources.

Slaughter Pollutes Water. Marin County recognizes the vital importance of water in the CWP, saying, “Because water is essential for our communities, our agricultural systems, and our environment, **unsustainable patterns of development and water use will not be supported.** This requires reuse, increased catchment and storage, watershed protection, improving groundwater recharge and conservation efforts, and maintaining high water quality.”²¹ Pollution anywhere will soon be everywhere. Slaughter is one of our nation’s top polluters and a dirty business. It’s a better fit for inland counties than for water bound ecosystems like Marin’s.

The Environmental Working Group documents that eight slaughterhouses consistently make the list of the nation's top 20 worst polluters of our waterways.²²

The UN’s Food & Agriculture Organization says, “The most significant environmental issue resulting from slaughterhouse operations is the discharge of wastewater into the environment. Like many other food-processing activities, the necessity for hygiene and quality control in meat processing results in high water usage and consequently high levels of wastewater generation...”²³

What’s in Slaughter Water?	
Blood, fat and tissue from carcasses Excreta from animals’ GI tracts Pathogens including Salmonella and Campylobacter Peracetic acid	High levels of nitrogen & phosphorus Ammonia Chlorine Carbon dioxide Hydrogen Peroxide 100 species of microorganisms

Source: UN FAO²⁴, OSHA²⁵

The FAO report continues,

“Poultry slaughterhouses release large amounts of waste into the environment, polluting land and surface waters as well as posing a serious human-health risk. The discharge of biodegradable organic compounds may cause a strong reduction of the amount of dissolved oxygen in surface waters, which in turn may lead to reduced levels of activity or even death of aquatic life. Macronutrients (nitrogen, phosphorus) may cause

¹⁹ <https://www.visitmarin.org/>

²⁰ <http://bit.ly/2cVPtpG>

²¹ <http://bit.ly/2m4o0Bj>

²² <http://www.ewg.org/meateatersguide/interactive-graphic/meat-processorsslaughterhouses/>

²³ http://www.fao.org/ag/againfo/home/events/bangkok2007/docs/part2/2_2.pdf

²⁴ http://www.fao.org/ag/againfo/home/events/bangkok2007/docs/part2/2_2.pdf

²⁵ <https://www.osha.gov/SLTC/poultryprocessing/hazards.html>

eutrophication of the affected water bodies. Excessive algal growth and subsequent dying off and mineralization of these algae may lead to the death of aquatic life because of oxygen depletion."²⁶

Indeed, a 2013 Sustainable Agriculture Research and Education study showed that both poultry Mobile Slaughter Units (MSUs) and small-scale on-site poultry slaughterhouses have highly prevalent levels of Salmonella and Campylobacter from compost and wastewater practices: "These foodborne pathogens were highly prevalent in wastewater, soil, and compost resulted from broiler processing on-farm. Although the practice of letting the processing wastewater flow on the soil to provide nutrients, it certainly can spread foodborne pathogens in the soil and surrounding environment. Furthermore, current compost practices do not seem to control pathogen presence."²⁷

Pollution doesn't stop at property lines. Boundaries, districts and zones serve Planning Commissions and property owners but our ecosystems know no such distinctions. Marin County rests on 14 sensitive watersheds and is home to many wetlands, tidelands, and riparian habitats. Community Marin's 2013 vision warns that, even without slaughter in the county, "Although farms are highly regulated there is not uniform compliance with Regional Water Quality Control Board rules,"²⁸ **a clear signal that Marin is not in a position to enforce compliance on a new industry with systemic water pollution.**

Slaughter Wastes Water. Professor James McWilliams of Texas State University reports that it takes an average of 132 gallons of water to slaughter an animal²⁹. Even chickens, which rank as one of the lowest water uses per body in slaughter, require 5-10 gallons per bird, according to a wastewater treatment firm³⁰. Just one 'small' on-site facility slaughtering only 20,000 chickens animals per year, as being contemplated in Marin, could use 200,000 gallons of water annually. This is an amount equal to **9.4 years of water use by the average Marin resident** according to December 2016 reports by Marin Municipal Water Department³¹. These estimates would certainly increase with multiple operations. Recent unusual heavy rainfall levels must not lull us into policy that allows a new industry that converts water into toxic waste.

Slaughter is a False Solution. Save Our Seashore wrote to the Marin Planning Commission and staff:

*"...if the Commission wants to provide the possibility of a Mobile Slaughterhouse Unit as a "starter kit," it should be understood that the County should also be obligated to ensure that such Units not pollute the environment and not disturb their neighbors. Although the Regional Water Board is supposed to ensure that disposal of waste water and composting of poultry waste is done properly, the Regional Board is underfunded and understaffed. **Thus County Environmental Health Services must be budgeted and staffed to ensure robust monitoring of environmental safeguards for any Mobile Slaughterhouse Unit operating in Marin.**"³²*

Marin taxpayers want county funds to be used to advance current environmental practices that are working, not to remediate industries like slaughter that have high pollution risk.

Toxic chemicals: Slaughter operations rely on many hazardous chemicals. The Occupational Safety and Health Administration (OSHA) provides an incomplete list including ammonia, chlorine, carbon dioxide, hydrogen peroxide, and peracetic acid.³³ Not just do these chemicals take an adverse toll on human health, but they harm our soil, air, and water.

²⁶ http://www.fao.org/ag/againfo/home/events/bangkok2007/docs/part2/2_2.pdf

²⁷ http://mysare.sare.org/sare_project/ls11-245/?page=final&view=print

²⁸ <https://sierraclub.org/san-francisco-bay/marin/community-marin>

²⁹ http://www.nytimes.com/2014/03/08/opinion/meat-makes-the-planet-thirsty.html?_r=2

³⁰ <http://www.hydroflotech.com/poultry-processing-wastewater-treatment-system-process-description>

³¹ <http://projects.scpr.org/applications/monthly-water-use/marin-municipal-water-district/>

³² <http://bit.ly/2lI3xqw>

³³ <https://www.osha.gov/SLTC/poultryprocessing/hazards.html>

Greenhouse gases: Any savings on transport emissions of slaughter going out of the county would be undone by bringing slaughter in county. Slaughter operations are intensive: electricity to run slaughterhouses and pump their wastewater is the main source of greenhouse gases from slaughterhouses, accounting for 5 percent of beef-related emissions, 13 percent of pork's and 24 percent of chicken's.³⁴

Mobile Slaughter Units (MSUs) are incorrectly viewed as a light-footprint solution. In fact, these are large, heavy trucks that we currently don't see on Marin's winding roads. They would conduct numerous trips into and out of the county as well as generate more truck traffic moving animals and carcasses to and from them.

On the Road with Mobile Slaughter	
Mobile Slaughter Units (MSU) trips to/from county.	Typical 36' heavy rig, 15,00 to 25,000 pounds on winding, rural unimproved roads. ³⁵
MSU stops in county.	Repeated MSU trips in and out of county and to stops where multiple ranchers converge on it.
Rancher trips to MSU stops.	Livestock hauling trucks transfer animals to MSU stops in Marin.
Cut & wrap transfer of carcasses	Truck transfer of carcasses from MSU stops to off-site cut & wrap facilities.

Not just do we risk *increasing* traffic because MSU's do not offer cut and wrap facilities, thus requiring additional drop-off and pick-up transports, but this also leads to a heavy toll on county road infrastructure.

Wildlife and predators: Per the CWP, the Bay Area accounts for only 4% of California's acreage, but is home to 36% of the state's total number of federally listed endangered and threatened species. Marin County has been a leader in wildlife coexistence in ways that have won us national acclaim, through projects like the groundbreaking Marin County Livestock and Wildlife Protection Program. Opening the door to slaughter in Marin endangers programs like these. According to Cornell University, over 60% of a harvested animal is unusable.³⁶ The smells of offal, blood, and, not infrequently, improperly disposed of waste, attract wildlife, predators, and disease-carrying pests -- not just putting our nonlethal predator control systems at risk, but then leading to the increased use of rodenticides, which Marin has long (and rightly) recognized as harmful.

The Marin County Board of Supervisors itself wrote a public letter in 2012 to the Department of Pesticide Regulation requesting that the DPR refuse to renew registration of 20 rodenticide products, "because the products pose unreasonable risk to children, pets, and non-target wildlife."³⁷ A local Wildcare initiative started in 2006 tests raptors, foxes, bobcats and other predatory animals -- shockingly, analysis of the data already shows 83% of tested animals receive a positive result for rodenticide in the blood³⁸ -- these numbers are likely to rise with slaughter in the county.

Marin County needs to continue moving toward clean industry, not dirty industries that trigger toxic pest control.

³⁴ <http://www.ewg.org/meateatersguide/interactive-graphic/meat-processorsslaughterhouses/>

³⁵ <http://www.mobileslaughter.com/specs.htm>

³⁶ <http://cwmi.css.cornell.edu/naturalrendering.htm>

³⁷ <http://egovwebprod.marincounty.org/EFiles/BS/AgMn/agdocs/120501/120501-ca1d-BS-attach-REP.pdf>

³⁸ <http://www.wildcarebayarea.org/advocacy/take-action-against-rodenticides/>

Poultry Slaughter Has Little Oversight. Because of USDA and CDFA exemptions, Marin slaughter operations could harvest up to 20,000 poultry and limitless rabbits with only annual or quarterly inspections, and up to 1,000 poultry and limitless rabbits with no inspection at all from either agency.³⁹ Without adequate and expert ante-mortem inspection, ranchers could in effect slaughter diseased and sick animals at will and may use unsanitary methods to do so.

An incomplete list of issues that indicate an animal is unfit for human consumption include:

- Elevated temperatures
- Severe injuries or wounds
- Illness
- Unreasonable dirtiness
- Recency of antibiotics
- Emaciation
- Bloody diarrhea
- Extreme pneumonia
- Central nervous system issues
- Abnormal respiration
- Lesions.⁴⁰

Word of such animals being slaughtered for consumption in Marin would endanger the reputation of the entire agricultural sector in the county. This is a clear example of how the risks of local slaughter outweigh its potential benefits.

Slaughter inherent health risks are amplified by scant oversight. One rancher told the Planning Commissioners that It's easy to kill a chicken. But this is an oversimplification. There is nothing simple about slaughter and the care and attention required. Sandol Johnson is a former USDA staffer and the current head of the Animal Science Department at Oklahoma Panhandle State University; in her book Slaughter and Preservation of Meat, she warns of hazards to meat products on slaughter operations:

“Flies live around the latrine, livestock, or areas of trash and then fly into areas of slaughter and processing. The flies will get on the carcass and meat products and leave the disease they are carrying on the meat. Flies lay their eggs on trash and food particles. These eggs will hatch and bring in more flies...Wandering animals such as cats and dogs can be hard pests to run off Dogs may also carry diseases and filth. Dogs will try to lap up blood and take pieces of the carcass off This can spread disease from diseased animals to humans Cats will climb and move around areas dogs cannot get to...”⁴¹

Johnson goes on to say that,

“dirt, mud, hair, blood, dried fat, meat particles, standing water, dirty water, and dirty equipment are all areas that allow flies and pests (vermin) to live. There are also germs (microorganisms) that can begin to grow very rapidly in the same areas these germs cannot be seen by the human eye. They may be called bacteria and are what cause disease in animals and humans.”

³⁹ http://ucanr.edu/sites/CEsonomaAgOmbuds/Selling_Meat/Poultry_Processing_Exemptions/
<https://www.cdfa.ca.gov/is/pdfs/PoultryGuidelines.pdf>
<http://ucfoodsafety.ucdavis.edu/files/26481.pdf>

⁴⁰ Johnson, Sandol. Slaughter and Preservation of Meat. 2005

⁴¹ Johnson, Sandol. Slaughter and Preservation of Meat. 2005

Johnson describes how these bacteria can be in a resting or dormant period until food becomes available for them to grow and says all of what they need to grow can be “found in and around a place of slaughter and processing... when the microorganism comes in contact with a meat or meat product, they can become attached to the meat and then begin to grow very quickly. Meat and meat products provide a very good source for the microorganism to grow.”⁴²

The Sustainable Agriculture Research & Education 2013 study found that birds slaughtered in poultry MSUs showed “significantly higher” *Campylobacter* concentrations than those processed on-farm and at the USDA-IF.⁴³ The lack of oversight that would happen under USDA and CDFA exemptions is a public health and safety risk, and Marin County has no plan nor (taxpayer-funded) staffing in place to ensure alternative oversight.

Allowing slaughter with little to no oversight puts Marin’s high animal welfare standards at risk, as thousands of animals could be killed with no inspections, and poorly trained or careless slaughter can cause an animal immense suffering.

Where steady oversight is in place, it sets a low bar. Marin County, known for its high standards, would lose control where USDA inspections are in place. Federal law, even when less stringent, preempts state and local jurisdiction -- the Supreme Court’s *NMA vs. Harris* decision in 2012 clearly presented this preemption⁴⁴ and states are effectively barred from enacting any laws concerning the handling of farmed animals at slaughterhouses that would increase anti-cruelty protections for animals, or set higher public safety and health standards for consumers.⁴⁵

Slaughter employment increases predilection for violent crime and on the job injuries. A University of Windsor and Michigan State University study used panel analysis of 1994-2002 FBI data on 581 counties and found that slaughterhouse employment increases total arrest rates, arrests for violent crimes, arrests for rape, and arrests for other sex offenses in comparison with other industries.⁴⁶

The *Yale Global Health Review* reports that “Significant theoretical and anecdotal evidence underlies the idea that slaughterhouse work is mentally harmful.” The review explains how desensitization to violence can cause “spillover” and “doubling” in the mental health of slaughter workers. “Living with the knowledge of their actions causes symptoms similar to those of individuals who are recipients of trauma: substance abuse, anxiety issues, depression, and dissociation from reality.”⁴⁷

And putting a slaughterhouse on wheels does nothing to mitigate the problems that the Yale review refers to. The *Texas Observer* reports “Farms that employ mobile slaughterhouse units—USDA-approved trucks that drive to the local farm and kill on site—are equally implicated. As one mobile slaughter worker noted, “It functions the same as any livestock facility, except it is much more condensed and put on wheels.”⁴⁸ In fact, small-scale facility and MSU workers are exposed to the full-range of the slaughter experience, unlike staff in a full-scale slaughterhouse who have compartmentalized workspaces and thus some isolation from some aspects of the stressful process.

These persistently traumatized slaughter workers’ mental health needs and documented increased propensity toward criminal activities⁴⁹ can stress mental health services, law enforcement, legal services, incarceration, and judicial infrastructures. Victims of violent crimes will also face direct economic impacts (e.g. medical and mental health care

⁴² Johnson, Sandol. *Slaughter and Preservation of Meat*. 2005

⁴³ http://mysare.sare.org/sare_project/ls11-245/?page=final&view=print

⁴⁴ <http://www.scotusblog.com/case-files/cases/national-meat-association-v-brown/>

⁴⁵ <http://bit.ly/2mFt8Q3>

⁴⁶ <http://oae.sagepub.com/content/22/2/158.abstract>

⁴⁷ <https://yaleglobalhealthreview.com/2016/01/25/a-call-to-action-psychological-harm-in-slaughterhouse-workers/>

⁴⁸ <https://www.texasobserver.org/ptsd-in-the-slaughterhouse/>

⁴⁹ <https://yaleglobalhealthreview.com/2016/01/25/a-call-to-action-psychological-harm-in-slaughterhouse-workers/>

costs, lost earnings, property damage) as well as intangible impacts (e.g. pain and suffering, decreased quality of life, psychological distress). One peer-reviewed study sourced by the NIH places the combined costs of one rape or sexual assault crime between \$80,403 and \$369,739⁵⁰ -- four additional rape or sexual assault crimes per year could cost \$321,612 to \$1,478,956, some of which would fall on Marin's taxpayers.

In addition to being emotionally harmful, slaughter is physically harmful. The Bureau of Labor Statistics reports injuries and illness in this industry as 2 ½ higher than the national average.⁵¹ The Occupational Safety and Health Administration counts exposure to hazardous chemical like ammonia among the dangers, as well as "biological hazards associated with handling live animals or exposures to feces and blood which can increase [the workers'] risk for many diseases."⁵² Introducing a livelihood that harms the psyches and bodies of its workers -- and puts citizens at risk -- is not in keeping with Marin's values.

Not a good target industry: Marin's own Comprehensive Economic Development Strategy (2015) says "Businesses that are directly tied to energy (solar, wind, etc.) and water (water-saving design and technology) resiliency, as well as businesses that generate less traffic and lower threats of environmental imbalance make for good target industries."⁵³

Slaughter in Marin would bring inherently high water costs and high threats of environmental imbalance through wildlife conflict, water pollution, soil pollution, and air pollution; slaughter does *not* make for a good target industry under the definition of our own CEDS plan. Nor is it in keeping with Marin County's high quality of life standards, and it is incompatible with maintaining and expanding our economic interests as a county. Residents choose to live in Marin County, the third most expensive place in the nation,⁵⁴ because it's beautiful and has a high quality of life... because, as our tourism tagline says, "it's different here. And not by accident."

Marin residents, including those involved in animal agriculture, have been thriving without the undue threats to our economy, environment and quality of life. As a county, we focus on sustainability first, making us a leader in the nation. We urge county officials to keep slaughter and its myriad of problems out of Marin; protect the home we all love.

Thank you for the opportunity to express our concerns.

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⁵⁰ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2835847/>

⁵¹ <https://www.osha.gov/SLTC/meatpacking/>

⁵² <https://www.osha.gov/SLTC/meatpacking/>

⁵³ http://marineconomicconsulting.com/whitepapers/Marin_CEDS_2015.pdf

⁵⁴ <http://www.marketwatch.com/story/the-most-unaffordable-place-to-live-in-america-is-2016-06-23>