

SERVING PETS IN POVERTY: A NEW FRONTIER FOR THE ANIMAL WELFARE MOVEMENT

By Amanda Arrington and Michael Markarian*

This article is dedicated to JC Ramos who meant so much to the Pets for Life (PFL) program. He not only inspired PFL to do more in the fight against injustice and discrimination, but he served his community with extreme dedication and compassion. There will never be another person like JC, and the PFL team was lucky to call him family.

Most people are aware of how poverty and structural inequality create challenges and barriers to accessing healthy food, education, jobs, health care, and housing. There is less awareness of how limited affordable veterinary and pet wellness services create similar obstacles and how that lack of access disadvantages millions of people and their pets across the United States.¹ Currently there are at least 19 million pets living with U.S. families whose income level is below the poverty line, which is triple the number of dogs and cats who enter animal shelters each year, and there are millions more in working poor and middle-class families struggling with the cost of caring for their pets.²

With 78 million dogs and 86 million cats in 80 million American households, pet ownership transcends geographical, racial, religious, and socio-economic boundaries demonstrating that love for pets is a consistent societal value.³ However, lack of access to information, advice, and direct animal care services produces hardships and heartaches for many pet owners in underserved communities.⁴ This denial of access to knowledge, counsel, and support generates a social justice issue in its own right.

Perpetuated by a lack of access to fundamental resources, race and income-based segregation is a centuries old problem.⁵ For example, food deserts are impoverished parts of the country with little or no access to fresh produce or full-fledged grocery stores.⁶ While they lack fresh fruit, vegetables, and whole foods, they are overrun with fast food chains and processed foods heavy in fat and sugar that contribute to the nation's obesity and disease epidemic—causing people in underserved communities to suffer at disproportionate rates.⁷

Similarly, there are animal resource deserts—entire neighborhoods with no veterinarians, no pet supply stores, no groomers, and no animal welfare infrastructure.⁸ When there are no veterinarians in a community, standard wellness care is not the norm—and familiarity, experience, and knowledge concerning common pet health concerns do not exist. When there are no pet supply stores or big box retailers, simple items like pet food or a collar and leash are out of reach. Pet owners end up spending more, thus experiencing disproportionate financial burdens because prices are higher and selections fewer at small corner stores, and many must wait until situations are dire to address a pet's medical needs.⁹

Additionally, the majority of people who live in poverty have to work extremely hard to provide even the most basic pet

care, yet are frequently accused of being irresponsible with their pets or even punished with fines and criminal charges because of access issues that are largely out of their control.¹⁰ Many people in low-income neighborhoods rely on public transportation, and they cannot take their pets across town on the bus or subway.¹¹ An animal may be unaltered because there are too many barriers to having the surgery done.¹² A dog may live outside because a landlord does not allow indoor pets, and affordable housing with pet-friendly options is hard to come by.¹³

In some cases, animal welfare professionals have formed negative opinions about people based on the location of their residence or perceived economic status with misperceptions and stereotypes of being cruel toward animals.¹⁴ Too often, these opinions exist without much understanding of the impact of poverty and systematic bias, which frequently isolate certain demographic populations and diminish or completely remove options and choices when it comes to pet care.

This physical divide creates negative assumptions and little to no positive engagement on the part of animal care agencies and service providers. Stereotyping entire communities of pet owners is not uncommon, both within and outside of the animal welfare movement, and it creates an “us versus them” mindset that furthers the trust gap between service providers and the community.¹⁵ Fear and judgment lead to continued lack of engagement, which creates further segregation and inaccessibility to resources. This in turn spreads more misconceptions among people outside of the affected groups.

In a lasting insight gained in the aftermath of Hurricane Katrina, The Humane Society of the United States (HSUS) saw that the poorest communities of Louisiana and Mississippi were places where people loved their pets but simply did not have access to basic services.¹⁶ Nationwide, about 86% of dogs and 90% of cats are spayed and neutered.¹⁷ The HSUS vowed to rebuild and strengthen the animal welfare capacity of the Gulf Coast and brought these critical spay and neuter and wellness care services to underserved pet owners.¹⁸

Using these same insights, The HSUS launched its Pets for Life (PFL) program in 2011.¹⁹ PFL embraces the human in humane, extends compassion and respect to all audiences of pet

* Amanda Arrington is the Director of the Pets for Life Program at The Humane Society of the United States and Michael Markarian is the Chief Operating Officer at The Humane Society of the United States (humanesociety.org).

owners, and promotes the understanding within the larger animal protection movement that a lack of financial means does not equate to lack of love for a pet.²⁰ The program not only delivers direct care to thousands of pets in underserved communities each year, but it also works to promote greater recognition within the animal welfare movement of how institutions produce and perpetuate unjust systems and policies.²¹ Today, The HSUS operates PFL programs in underserved areas of Los Angeles and Philadelphia, and partners with and trains local animal welfare groups, shelters, and animal control agencies in thirty-two other communities—from major metropolitan cities to extremely rural regions—to share these ideas around the country.²² Nationwide, the Pets for Life program has served more than 130,000 pets in underserved areas, and of those, 88% were unaltered—showing the much lower prevalence of spaying and neutering in underserved communities compared to the national rate of only about 10% of owned pets being unaltered.²³

The program has also helped to overcome a long-held misconception that people in low-income communities or communities of color are opposed to spaying and neutering—thus the reason for low sterilization rates.²⁴ Free spaying and neutering services combined with transportation to and from veterinary appointments and positive engagement has resulted in almost 90% of these pets sterilized through the program.²⁵ This proves that high percentages of unaltered pets is due to lack of access and not because of differing belief systems or how much people care for their pets. Race and ethnicity are not primary determinants in utilizing veterinary services.²⁶ In fact, decision-making by pet owners who are Latino and African-American is consistent with that of the behavior of non-Hispanic white pet owners around spay and neuter.²⁷

A large majority of people in underserved areas do not know animal welfare agencies exist as a potential resource because information is simply not being shared by service providers in an effective way or with the community's perspective in mind.²⁸ Also, some people are apprehensive to reach out to service providers for fear of unfavorable outcomes, such as having their pets taken away from them or being punished for not having the resources to provide medical care.²⁹

Additionally, 84% of pet owners served by PFL had never reached out to the local shelter or animal control agency.³⁰ However, 89% of pets came from sources within the pet owner's immediate area.³¹ There are many reasons for this connection deficiency. For instance, many in the animal welfare field have discussed and treated the issue of companion animal cruelty and neglect the same way for decades, resulting all too often in underserved neighborhoods being stigmatized as places where cruelty is prevalent.³² Therefore, the experience that many of these pet owners have is negative either because they are insulted and belittled by service providers, or at times even punished with fines or criminal charges for neglect or cruelty.³³ There is an immense need to repair distrust and show that animal welfare extends compassion beyond animals, to include treating people with dignity, respect, and understanding.

The story of Kevin and Boss Lady illustrates how people and pets suffer the injurious consequences of complex societal issues and then see their difficulties compounded by the animal welfare system.³⁴ Kevin was walking his dog, Boss Lady, down the street one day when a police officer, in a case of mistaken identity, shocked him with a stun gun.³⁵ Kevin was taken to a hospital and Boss Lady was taken to the local animal control agency.³⁶ When authorities realized their error and released Kevin, he went to retrieve Boss Lady only to find there were expensive fees that he had to pay to get her back.³⁷ The police department and shelter denied Kevin's requests for help even in light of the police department's error.³⁸

On his own, Kevin would not have been able to pay the fees to take his dog home, and the two would have been unfairly separated.³⁹ Kevin would have lost his companion and Boss Lady would have entered the shelter system with her fate unknown.⁴⁰ The sad circumstances involving Kevin and Boss Lady are not rare or extraordinary, but rather are representative of discriminating processes and policies that some people must face on a regular basis, and that ultimately tear families apart.

Keeping people and pets together is a much better outcome than adding to the intake of overburdened shelters that are already working hard to increase adoptions and reduce euthanasia rates. Strengthening the options for animals can also be a pathway to connect people with other social benefits and services. In one example, caseworkers with a needle exchange program had been trying to provide services to a group of drug users squatting in an abandoned building, but the inhabitants rebuffed them at every turn.⁴¹ The drug users were taking care of a colony of cats nearby, and PFL staff members were able to gain their trust by providing services to the cats.⁴² This relationship in turn made the clients more open to being introduced to the needle exchange program.

Recognizing the barriers to services that exist for many pet owners and taking a deeper look at the system's imbalances is not only the right thing for animal welfare but also the way to achieve long-term, sustainable change in countless communities. The driving force behind the PFL program is to provide services that people want and need for their pets and to be a catalyst for widespread availability to veterinary care, supplies, and information. There is a cumulative effect from long-standing practices and prejudices that requires patient, consistent, proactive outreach, and careful listening to all perspectives. However, no short cut will instill faith in the system and build bridges to underserved communities. Nothing will replace face-to-face, positive connection, and empathy in the effort to create sustainable, long-term access to resources, and to guarantee their effective use. The social, psychological, and medical benefits of having a pet should not be available or viable only for select groups or classes of households.

Even when backgrounds and current circumstances are diverse, there is an ease in building relationships and finding commonalities around pets. *Animals provide a very natural way for people of different backgrounds to connect and they serve as a critical reminder that all people are more alike than*

different. Because of this, animal welfare outreach presents a special opportunity in underserved communities and can provide a bridge to other social issues. A fundamental shift in industry philosophy and policy will position animal welfare as a thought leader and actor in social justice and will distinguish it as a more just and inclusive movement.

For decades, the animal welfare movement as a whole has been making progress on companion animal issues, specifically the reduction in euthanasia of healthy, adoptable animals.⁴³ In the 1970's, about 15 million healthy and treatable dogs and cats were euthanized in shelters each year, but today that number has declined to 2.4 million.⁴⁴ Popularizing pet adoption, aggressive spay and neuter programs, community partnerships with rescue and foster groups, retention programs to keep pets and families together, and other innovative efforts have driven down euthanasia rates.⁴⁵

*With an average of 6.5 million dogs and cats entering animal shelters every year, our movement still needs to provide vital services for the homeless and stray populations, but the time has come to shift resources to focus more attention on pets living in poverty outside the shelter.*⁴⁶ There is more work to be done, and

we need to open up new fronts of activity to help companion animals, including the 19 million pets currently living in poverty.⁴⁷ Celebrating the human-animal bond and eliminating the barriers that hamper the broadest possible promotion of companion animal welfare can ensure a future that takes into account all pets in a community, not just those who end up at a shelter.

The Pets for Life program has demonstrated that a deep care and respect for animals transcends social and economic boundaries and is a tie that binds us all. Everyone who wants to provide a loving home to animals deserves access to the resources that make pet keeping possible. The animal welfare movement's efforts to address lack of access to animal services in underserved communities should be strengthened as a critical priority nationwide. As this happens, entrenched social prejudices will diminish, with tangible benefits for humans, animals, and the larger society. Pets enhance the lives of humans and everyone who so chooses should have the opportunity to experience the unconditional love and meaningful relationship a pet brings.⁴⁸ The bond people have with their pets should not depend on income, which ZIP code someone lives in, or the language they speak.



ENDNOTES

¹ See Malinda Larkin, *Back to Basics: Veterinarians look to fundamentals to help underserved afford care*, JAVMA NEWS (Nov. 16, 2016), <https://www.avma.org/News/JAVMANews/Pages/161201a.aspx>; Elia Isquith, *How the ravages of inequality fall on the pets of the poor: "We're putting people in a Catch-22,"* SALON (Apr. 17, 2015, 8:00 AM), https://www.salon.com/2015/04/17/how_the_ravages_of_inequality_fall_on_the_pets_of_the_poor_were_putting_people_in_a_catch_22/.

² See U.S. CENSUS BUREAU, INCOME AND POVERTY IN THE UNITED STATES 12 (2016), <https://www.census.gov/content/dam/Census/library/publications/2017/demo/P60-259.pdf> [hereinafter INCOME AND POVERTY] (pointing out that in 2016 there were 40.6 million people in poverty); U.S. CENSUS BUREAU, HOUSEHOLDS AND FAMILIES 5 (2010), <https://www.census.gov/prod/cen2010/briefs/c2010br-14.pdf> [hereinafter HOUSEHOLDS AND FAMILIES] (estimating that there is an average of 2.58 people per household which means that there are 15.7 million households in poverty); AM. PET PRODUCTS ASS'N, 2017-2018 APPA NATIONAL PET OWNERS SURVEY 6 (2017) [hereinafter PET OWNERS SURVEY] (demonstrating that each household own on average 1.8 pets (1.49 dogs and 2.0 cats) which is approximately 19 million pets living in poverty); *Shelter Intake and Surrender*, AM. SOC'Y FOR THE PREVENTION OF CRUELTY TO ANIMALS, <https://www.aspca.org/animal-homelessness/shelter-intake-and-surrender/pet-statistics> (last visited Dec. 20, 2017) [hereinafter *ASPCA*] (noting that approximately 6.5 million companion animals enter U.S. animal shelters nationwide every year).

³ See *U.S. Pet Ownership Statistics*, AM. VETERINARY MED. ASS'N (2012), <https://www.avma.org/KB/Resources/Statistics/Pages/Market-research-statistics-US-pet-ownership.aspx>.

⁴ See Michael Sharp, *Kind Streets*, MEDIUM (2015), <https://medium.com/@HumaneSociety/kind-streets-e12c000e1432> (documenting instances of where pet owners can't access basic services for their pets because of geographic and financial reasons).

⁵ See Camila Domonoske, *Interactive Redlining Map Zooms in On America's History of Discrimination*, NPR (Oct. 19, 2016, 3:22 PM), <http://www.npr.org/sections/thetwo-way/2016/10/19/498536077/interactive-redlining-map-zooms-in-on-americas-history-of-discrimination>; Terry Gross, *A 'Forgotten History' Of How The U.S. Government Segregated America*, NPR (May 3, 2017, 12:47 PM), <https://www.npr.org/2017/05/03/526655831/a-forgotten-history-of-how-the-u-s-government-segregated-america>.

⁶ See *Nutrition Digest*, AM. NUTRITION ASS'N, <http://americannutritionassociation.org/newsletter/usda-defines-food-deserts> [hereinafter *Nutrition Digest*].

⁷ See *id.*

⁸ See *Lifeline Animal Project Takes Over HSUS' Pets for Life Program in Atlanta*, LIFELINE ANIMAL PROJECT (Aug. 2, 2017), <https://lifelineanimal.org/news/253-lifeline-animal-project-takes-over-hsus-pets-for-life-program-in-atlanta> (discussing the critical lack of accessible and affordable animal welfare services, resources, and information for people and pets in underserved communities); Keith Seinfeld, *The real reason no one buys produce in low-income areas*, KNKX (Jan. 30, 2013), <http://knkx.org/post/real-reason-no-one-buys-produce-low-income-areas> (analogizing food deserts to areas that also lack basic animal-care services).

⁹ See *Nutrition Digest*, *supra* note 6; Phillip Kaufman et al., *Do the Poor Pay More for Food? Item Selection and Price Differences Affect Low-Income Household Food Costs*, U.S. DEP'T OF AGRIC. ECON. RESEARCH SERV. (Dec. 1, 1997), <https://www.ers.usda.gov/publications/pub-details/?pubid=40817>; DeNeen L. Brown, *The High Cost of Poverty: Why the Poor Pay More*, WASH. POST (May 18, 2009), <http://www.washingtonpost.com/wp-dyn/content/article/2009/05/17/AR2009051702053.html>.

¹⁰ See Jon Silman, *Pasco woman who couldn't afford vet is convicted of animal cruelty*, TAMPA BAY TIMES (Apr. 25, 2013, 2:43 PM), <http://www.tampabay.com/news/courts/pasco-woman-who-couldnt-afford-vet-is-convicted-of-animal-cruelty/2117238>; Tommie Clark, *Woman charged after performing surgery on her dog, killing it*, KCCI DES MOINES (June 24, 2017, 3:22 PM), <http://www.kcci.com/article/police-woman-performed-dogs-surgery-with-knife-tongs-in-living-room/10213287>.

¹¹ See Gillian B. White, *Stranded: How America's Failing Public Transportation Increases Inequality*, THE ATLANTIC (May 16, 2015), <https://www.theatlantic.com/business/archive/2015/05/stranded-how-americas-failing-public-transportation-increases-inequality/393419/>; Jenny Hyde, *Transportation: The Overlooked Poverty Problem*, SHARED JUSTICE (Mar. 10, 2016), <http://www.sharedjustice.org/domestic-justice/2016/3/10/transportation-the-overlooked-poverty-problem> (drawing on fact that that people from low-income neighborhoods rely on public transportation, and if they have pets, they are unable to travel with them).

¹² See *id.* (pointing out that having to rely on public transportation is a barrier to access health services for your pet because you cannot take your pet with you on public transportation).

¹³ See Josh Leopold et al., *The Housing Affordability Gap for Extremely Low-Income Renters in 2013*, URBAN INST. (June 15, 2015), <https://www.urban>.

org/research/publication/housing-affordability-gap-extremely-low-income-renters-2013/view/full_report; *The State of the Nation's Housing 2014 Executive Summary*, JOINT CTR. FOR HOUS. STUDIES OF HARV. U. 6 (2014), <http://www.jchs.harvard.edu/sites/jchs.harvard.edu/files/sonhr14-color-ch1.pdf>; *America's Housing Affordability Challenges*, EQUITABLE HOUS. INST. (Nov. 2016), <https://www.equitablehousing.org/affordable-housing-challenges.html>; *Increasing Pet Friendly Housing*, ANIMAL SHELTERING, <https://www.animalsheltering.org/programs/pets-are-welcome> (last visited Dec. 20, 2017).

¹⁴ See David Vognar, *Animal Welfare, Human Welfare Linked*, HUFFINGTON POST (June 1, 2012, 11:22 AM), http://www.huffingtonpost.com/david-vognar/animal-welfare-poverty-_b_1560440.html; *Poor People Should Be Able to Have Dogs Too*, OUT THE FRONT DOOR (Nov. 22, 2016, 1:09 PM), <http://outthefrontdoor.com/2016/11/22/poor-people-should-be-able-to-have-dogs-too/>.

¹⁵ See Vognar, *supra* note 14.

¹⁶ See M. Carrie Allan, *10 Years After Katrina, the Storm That Changed Us*, MEDIUM (Aug. 17, 2015), <https://medium.com/@HumaneSociety/reflections-10-years-after-katrina-c970882366d6>; Julia Kamysz Lane, *Treading Water* (Nov. 2008), <https://thebark.com/node/152/3196>.

¹⁷ See *Pets by the Numbers*, THE HUMANE SOC'Y OF THE U. S., http://www.humanesociety.org/issues/pet_overpopulation/facts/pet_ownership_statistics.html?referrer=https://www.google.com/.

¹⁸ See Wayne Pacelle, *Pets for Life: Keeping Animals in Loving Homes and Out of Shelters*, A HUMANE NATION (Nov. 24, 2014), <https://blog.humanesociety.org/wayne/2014/11/pets-for-life-mentorship-cities.html>.

¹⁹ See *id.*

²⁰ See Kate Hodgson, *Pets' Impact on Your Patients' Health: Leveraging Benefits and Mitigating Risk*, 28 J. OF THE AM. BOARD OF FAM. MED. 526 (2015), <http://www.jabfm.org/content/28/4/526.full>.

²¹ See *Pets for Life: 2017 Program Report*, THE HUMANE SOC'Y OF THE U.S. 4-10 (2017), https://www.animalsheltering.org/sites/default/files/content/2017%20Data%20Report_0.pdf [hereinafter *PFL 2017 Program Report*]; Adia Harvey Wingfield, *The Failure of Race-Blind Economic Policy*, THE ATLANTIC (Feb. 16, 2017), <https://www.theatlantic.com/business/archive/2017/02/race-economic-policy/516966/>; Adrian Florido, *Black, Latino Two-Parent Families Have Half The Wealth of White Single Parents*, NPR (Feb. 8, 2017, 1:06 PM), <http://www.npr.org/sections/codeswitch/2017/02/08/514105689/black-latino-two-parent-families-have-half-the-wealth-of-white-single-parents>.

²² See *PFL 2017 Program Report*, *supra* note 21, at 2-4.

²³ See *id.* at 2, 12.

²⁴ See Jessica L. Decker Sparks et al., *Race and ethnicity are not primary determinants in utilizing veterinary services in underserved communities in the United States*, J. OF APPLIED ANIMAL SCIENCE, 1-2 (2017), <http://dx.doi.org/10.180/10888705.2017.1378578>.

²⁵ See *PFL 2017 Program Report*, *supra* note 21, at 13.

²⁶ See Decker Sparks et al., *supra* note 24, at 1.

²⁷ See *id.* at 2.

²⁸ See Julia Thiel, *Welcome to the Cook County animal maze*, CHI. READER (Mar. 25, 2015), <https://www.chicagoreader.com/chicago/cook-county-animal-rabies-control-lost-dogs-john-fritchey/Content?oid=16997036>.

²⁹ See *PFL 2017 Program Report*, *supra* note 21, at 12, 16.

³⁰ See *id.*

³¹ See *id.* at 16.

³² See *id.* at 12.

³³ See *id.* at 8-9.

³⁴ See Daniel Burke, *Return-to-Owner: How will you re-evaluate your shelter's RTO policy to tell a different story?*, THE HUMANE SOC'Y OF THE U.S. (Mar. 28, 2017), <https://www.animalsheltering.org/blog/return-owner>.

³⁵ See *id.*

³⁶ See *id.*

³⁷ See *id.*

³⁸ See *id.*

³⁹ See *id.*

⁴⁰ See *id.* (noting that the Pets for Life team stepped in and paid the fees, giving Kevin and Boss Lady a happier ending to this situation).

⁴¹ Telephone Interview with Amanda Arrington, Director, Pets for Life at The Humane Society of the United States (Sept. 12, 2017).

⁴² See *id.*

⁴³ See *Statement on Euthanasia*, THE HUMANE SOC'Y OF THE U.S., http://www.humanesociety.org/about/policy_statements/statement_euthanasia.html.

⁴⁴ See *id.*

⁴⁵ See *id.*

⁴⁶ See *ASPCA*, *supra* note 2 (noting that approximately 6.5 million companion animals enter U.S. animal shelters nationwide every year).

⁴⁷ See INCOME AND POVERTY, *supra* note 2, at 12 (pointing out that in 2016 there were 40.6 million people in poverty); HOUSEHOLDS AND FAMILIES, *supra* note 2, at 5 (estimating that there is an average of 2.58 people per household which means that there are 15.7 million households in poverty); PET OWNERS SURVEY, *supra* note 2, at 6 (demonstrating that each household own on average 1.8 pets (1.49 dogs and 2.0 cats) which is approximately 19 million pets living in poverty).

⁴⁸ See generally Leslie Burke, *Animals as Lifechangers and Lifesavers: Pets in the Redemption Narratives of Homeless People*, THE HUMANE SOC'Y INST. FOR SCI. & POLICY ANIMAL STUDIES REPOSITORY (2013), http://animalstudiesrepository.org/cgi/viewcontent.cgi?article=1007&context=acwp_habr (discussing instances of how pets transformed people's lives).

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¹¹ See *USDA Agricultural Projections to 2026*, USDA 39 (Feb. 2017), <https://www.ers.usda.gov/webdocs/publications/82539/oce-2017-1.pdf?v=42788> (reporting that in 2014, Americans consumed 199 pounds per person of beef, pork, and chicken and projecting that this number will rise to 214 pounds per person by 2026).

¹² See SIMON, *supra* note 10, at xxii ("This development is driven partly by subsidies, partly by efficient methods of factory farming, and partly by the industry's practice of offloading its costs onto others").

¹³ While the suffering of the animals who are exploited and tortured by the billions in CAFOs and slaughterhouses is not the primary focus of this Article, it would be unconscionable to proceed without acknowledging their reality. See, e.g., *Farm Animal Welfare: A Closer Look At Animals on Factory Farms*, ASPCA, <http://www.aspc.org/animal-cruelty/farm-animal-welfare/animals-factory-farms> (last visited Dec. 20, 2017) (describing how female breeding pigs spend their lives in gestation crates barely larger than their bodies, how their piglets are taken from them at two to three weeks of age and confined to enormous (but overcrowded) sheds with no access to fresh air, sunlight, earth, or even windows, and how they are finally slaughtered after several years of constant pregnancy and birth); The Editorial Board, *No More Exposés in North Carolina*, N.Y. TIMES (Feb. 1, 2016), <https://www.nytimes.com/2016/02/01/>

opinion/no-more-exposés-in-north-carolina.html (describing how pigs have been stabbed, beaten with sledgehammers, and boiled alive at slaughterhouses).

¹⁴ See SIMON, *supra* note 10, at xxi ("[M]om-and-pop farms are mostly gone—either acquired by large corporate operations or plowed under for new housing subdivisions. For instance, between 1954 and 2007, even as demand for dairy increased by 40 percent, the number of US dairy farms plummeted from 2.9 million to 65,000."); see also Aaron M. McKown, Note, *Hog Farms and Nuisance Law in Parker v. Barefoot: Has North Carolina Become a Hog Heaven and Waste Lagoon?*, 77 N.C. L. REV. 2355, 2355 (1999) (stating that in North Carolina, "corporate-run hog facilities have forced many independent hog farms out of business").

¹⁵ See *Factory Farm Workers*, FOOD EMPOWERMENT PROJECT, <http://www.foodpower.org/factory-farm-workers/> (last visited Dec. 20, 2017) (explaining that CAFO workers are subjected to many health and safety hazards, including but not limited to exposure to inhalable particulate matter and harmful gases such as ammonia and hydrogen sulfide); *id.* (explaining that many workers are undocumented individuals, who CAFO owners seek out "because they are less likely to complain about low wages and hazardous working conditions."); see also *Blood, Sweat, and Fear: Workers' Rights in U.S. Meat and Poultry Plants*, HUMAN RIGHTS WATCH 52-53 (2004), <https://www.hrw.org/report/2005/01/24/>