

July 10, 2019

Dear DATCP Board,

Thank you for your time and consideration.

Please approve the draft of the ATCP 51, state livestock siting standards at today's meeting, and bring them forward for public comment/hearings.

Agricultural practices in our county (Jefferson County) as well as throughout the state have changed considerably since the rules were implemented.

For instance, the current odor scoring method/odor management worksheet for Livestock Siting applications does not take into account newer methods being used for handling agricultural waste, such as incineration of mortality (implemented within the past 5 years) and onsite production of fertilizer from manure (implemented over the last decade.) This was shared with the Livestock Facility Siting Review Board through my public comments at a county hearing, pertaining to a sizeable chicken facility expansion in our community.

The draft is based on years of sound and reasonable input from land and water and agricultural experts. The lessons learned over the past decade are incorporated into the draft.

It's time to move forward using the information and recommendations gleaned from 3 sets of experts. These are some of our state's top technical advisers.

If the DATCP Board does not approve sending the standards to public hearing at tomorrow's meeting, the draft rule will effectively die. Please do not throw away 8 years of work by knowledgeable and committed individuals.

If people disagree with certain details in the draft rule, the time to express these concerns is during the public comment period.

The point has been made that "if local governments or neighbors were unhappy about some aspect of a CAFO operation, they could take their complaint to the Livestock Siting Review Board." It is important to note, the Livestock Facility Siting Review Board is not a policy-making board.

The pressure to put this off so the necessary legal deadlines are missed is apparent. Industry groups have already weighed in on the 2017 draft, and they, like other stakeholders, will have the opportunity to do so again during public comment.

I respectfully request you send this draft rule out to public hearing, without further delay.

Sincerely,
Anita J. Martin
261 Pinnacle Dr.
Lake Mills, Wisconsin 53551-2003