



Wisconsin Land+Water Conservation Association

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July 5, 2019

Dear Board Members of the Department of Agriculture, Trade, and Consumer Protection,

On behalf of WI Land+Water, I'm contacting you with a respectful request to approve sending the draft ATCP 51 Livestock Facility Siting Rule to public hearing at your upcoming July 10, 2019 Board meeting.

Since ATCP 51 took effect thirteen years ago, Wisconsin's agricultural landscape has changed tremendously; yet, the rule has not been updated accordingly. In order to ensure that Wisconsin agriculture remains productive and viable, and lives up to the quality assurance process built into the law, the board should follow through with the process set forth in statute by moving the draft rule to public hearing.

Furthermore, incorporated into the draft rule is input and oversight provided by Technical Expert committees in 2015 as well as in 2019, which has improved the rule considerably. In the absence of an updated rule, the county conservation departments who WI Land+Water represents struggle to implement the rule consistently, which creates a difficult situation for both counties and farms alike.

Particularly in the Year of Clean Drinking Water, it is timely to update the rule and incorporate new technical standards developed since 2006, such as NRCS 313 Waste Storage Facility and NRCS 590 Nutrient Management, as well as NR 151 Runoff Management. I am hopeful the Board approves sending the draft rule to hearing, and allows the public discourse to continue on this topic.

Thank you for the opportunity to provide input on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Krueger', with a long horizontal flourish extending to the right.

Matt Krueger
Executive Director