

Therriault, John

PC# 3054

From: Bern <stagecoachtrail@sbcglobal.net>
Sent: Friday, January 30, 2015 3:14 PM
To: Therriault, John
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Subject: Case # R2012-023A

Pollution Control Board
John Therriault, Assistant Clerk
James R. Thompson Center
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Dear Sirs/Mesdames:

I am speaking for myself, but also I hope for the millions of Illinois men and women who would speak to you with equal vehemence IF THEY KNEW of the hazards posed to the state's environment by unacknowledged large scale confined animal operations (CAFOs).

As in many states across the country, beginning decades ago these operations with purported economies of scale were thought to represent the cutting edge of an agricultural system that promised to increase yields at lower production costs for the good of the industry and the public. As such and as with agricultural operations in general, they were given wide latitude to operate without scrutiny due to the perception of them as benign enterprises. So many of the public, even those astute enough to know that food comes from farms, continue to have this attitude, despite continual warnings that the perception is not the entire reality.

Three decades of experience and hundreds of studies later, that perception is husbanded far more carefully by the CAFO industry than the livestock that is its lifeblood and its responsibility. The reality which every honest observer now acknowledges is that both the studies and the wretched experience of those living near these facilities strongly belie the technological promise and public relations of the industry. But the personal suffering of thousands of CAFO neighbors aside, the greater threat confronting the nation's policy makers is the continuing refusal of government and the industry to fully acknowledge the large-scale threats to lands and waters far beyond the neighbors' homes.

Despite a feckless permitting statute and chronic bureaucratic indifference, Illinois has managed to survive to this point without major calamities. But luck is not an adequate substitute for planning, as IPCB has acknowledged in its recent regulations affecting CAFOs. I am now told that presently in Illinois CAFOs "present themselves" for regulation only if they become known to the state through violations/complaints. Other CAFOs are not required to acknowledge their existence. The result is that there is oversight of practices at CAFOs known to exist but none at a class of "mystery" operations.

Those operations known to the state will bear the load of regulation while the uncounted others will continue to operate in rogue status UNTIL their practices under this freedom from regulation result in environmental damage to their neighbors and the state's lands and waters.

The IEPA needs to create a comprehensive inventory of CAFOs so they have the ability to regulate them and evaluate which ones should have permits. The only way to do this without wasting valuable taxpayer dollars is to require CAFOs to report information to the agency through a reporting program. Enacting a reporting program is a common sense approach and there is no justifiable reason why CAFOs should not have to submit basic information about their operations to regulators.

Thank you for considering my opinion.

Bern Colleran
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