



June 12, 2003

Ms. Marie E. Tipsord
Hearing Officer, Illinois Pollution Control Board
100 W. Randolph St., Suite 11-500
Chicago, Illinois 60601
Re: Public Comment on R03-19

P.O. Box 648 • Rochester, IL 62563
Phone (217) 498-9707 • Fax (217) 498-9235
E-mail: isa@illinoisstewardshipalliance.org

Dear Ms. Tipsord:

The Illinois Stewardship Alliance is a 29-year old citizen's organization that promotes a safe and nutritious food system, family farming and healthy communities by advocating diverse, humane, socially just and ecologically sustainable production and marketing practices.

ISA is heartened that the ICPB is considering changes to the NPDES permitting process that will provide for greater public participation and input. We work with Confined Animal Feeding Operation permitting, and have seen first hand how the citizens and taxpayers of Illinois can "lose" their voices when public participation is limited because of the control of the process by livestock integrators.

It is very important for citizens to have a fair opportunity to comment on all aspects of a proposed NPDES permit. The Clean Water Act intends NPDES permit conditions and limits to be subject to significant public scrutiny, and the Illinois Environmental Protection Act also envisions widespread public involvement in permit development and issuance. For the CAFO NPDES permit currently undergoing revision, this was commented on by IEPA during the May 28, 2003 Public Hearing held in Springfield by their legal counsel.

NPDES permits should not be issued without affording an opportunity for public comment. This should be true for both General and Individual Permits. Moreover, when significant substantive changes are made to a permit after the public comment period is closed, an additional opportunity for public input should be provided on the revised portions. In addition, regulations should ensure the establishment of a sufficient administrative record to justify a permit.

It is also important for our regulations to specify that permit limits may not allow discharges that cause or contribute to violations of water quality standards, that limits and conditions should be enforceable by citizens as well as by the Illinois Environmental Protection Agency, and that monitoring terms should be included in the permits. These revisions will help protect water quality and ensure Illinois' compliance with the Clean Water Act.

Sincerely,

Elizabeth Burns

Elizabeth Burns, MS

Illinois Stewardship Alliance