

Beth Baranski
1015 South Bench Street
Galena IL 61036
(563) 580-6192

January 16, 2014

Illinois Pollution Control Board
John Therriault, Assistant Clerk
James R. Thompson Center
100 West Randolph Street, Suite 11-500

Re: Comments on First-notice Opinion
Case No. R2012-023
Proposed Amendments to 35 Ill. Adm. Code Parts 501, 502, and 504

Dear IPCB members:

I attended two of the public hearings on the proposed amendments and have read, with great interest, your first-notice opinion. As a resident of the state concerned with both a sustainable agricultural economy and water quality issues, I hope that you will revise your amendments as needed to ensure that the directives given are clear, easily definable, measurable, incontrovertible, and based on the recommendations of objective scientists (rather than hired engineers).

In particular, I hope you will consider increasing the siting setbacks of CAFOs from surface waters and drinking water supplies, and increasing the soil depth required for the application of livestock waste in karst areas. I believe that, in the long term, this would have clear benefits for all:

Protection of water quality would be less reliant on management techniques, therefore less vulnerable to uncontrollable adverse conditions (e.g. weather), human error or negligence.

Inspection, reporting and enforcement issues would be reduced, as the conditions for establishing adequate protection would be permanent, physical elements.

Farmers would be able to do their work with greater assurance that they will not end up in court debating nuanced interpretations of terms or intentions.

Thank you for your time and consideration.

Sincerely,

--- Beth Baranski