



Sustain Rural Wisconsin

May 28, 2015

Professor Ken Genskow, Chairman
UW-Extension Manure Irrigation Workgroup
Environmental Resources Center
445 Henry Mall Room 202
Madison, WI 53706 *Sent electronically as well as by postal service*

Professor Genskow and all Members of the Manure Workgroup -

Around the state of Wisconsin, where rural communities formerly opened their windows to the fresh air of a new season, people are suffering from exposure to the nearness of untreated sewage from livestock operations. As the state agency explores aerial spraying systems to dispose of an overflowing flood of manure, grassroots groups foresee an approaching crisis.

While each of us is dependent upon a safe and adequate supply of our most vital resource, it is often the rural citizens who are first to see, taste, and be sickened by water that has become contaminated, air unsafe to breathe.

Knowing that the intention of the Manure Workgroup is to conclude meetings soon and make recommendations on the practice of statewide adoption of liquid manure spraying, Sustain Rural Wisconsin Network (SRWN) would like to submit comments as part of the public record.

We are asking that you be guided by the voluminous scientific studies that have been set before you over the past two years - studies that warn of the consequences when humans are exposed to deadly pathogens associated with livestock manure.

You've reviewed research done by The Children's Health Study on how airborne particulate matter harms children's lungs for life. The damage is irreversible.

Among the presentations you've watched, microbiologist Mark Borchardt revealed that the "bulk of pathogens reside in the liquid portion of manure" - the portion that would be spray irrigated, should this practice be allowed. Pathogenic bacteria can be transported by way of wind currents - drift.

Research studies in the Journal of Animal Science show how pressurized irrigation systems to apply liquid manure increase the chances that microorganisms will become aerosolized. When this happens, there are no sufficient setbacks to prevent human exposure or the long-lasting consequences to this exposure. There are no precise valve settings on sprayer nozzles that can protect against operator error, mechanical malfunction, or unpredictable wind velocity.

Goldman Environmental Prize winner Lynn Henning provided testimony to the Workgroup in April of last year. With 15 years experience dealing with liquid waste practices in Michigan where she is a family farmer, Ms. Henning provided documentation detailing the unsustainable, hazardous effects of untreated animal waste on rural towns. Regarding aerial spraying systems, she warned, "There's not a doubt, the DNR is courting a statewide disaster."

The Environmental Protection Agency reminds us that treatment of human wastes is required by law prior to discharging into the environment. Livestock wastes can be 100 times more concentrated than human wastes and yet are spread untreated across rural Wisconsin.

The industry needs justification to advance their aerial spraying agenda - less tankers hauling sewage on rural roads. Yet, undisclosed by the industry is the fact that piping untreated manure to irrigation equipment in the field has a dangerous history. Manure has a way of escaping its confines. Underground pipelines frequently fail due to pipes that become plugged or even rupture - releasing hundreds of thousands of gallons of sewage. If these pipelines are located on highly permeable land, the contamination is extensive and can threaten an entire aquifer.

Many of us have friends living in Kewaunee County where intensive industrial farming has rendered the water unsafe to drink. Wind velocity exposes these people to air unsafe to breathe. They live on land they cherish which has been violated due to insufficient enforcement by the very agency charged with protecting environmental life. We are saddened, alarmed, outraged. This is a travesty of the worst kind.

The extent of the collapse of authority within the Wisconsin Department of Natural Resources was confirmed by former Deputy Secretary Matt Maroney who stated that DNR is no longer a strong advocate for the environment - one way or the other.

Judge Jeffrey Boldt further exposed severe deficiencies within the WDNR. “The proliferation of contaminated wells represents a massive regulatory failure to protect groundwater...” And Gordon Stevenson, former runoff manager at WDNR, predicts that it is just a matter of time before we have large scale contamination of our groundwater.

With talk of industrial hog CAFOs seeking cheap land and plentiful water in Wisconsin, we can anticipate proliferation of uncontrolled sewage disposal of crisis proportions.

Governor Walker recently declared Wisconsin in a State of Emergency. This was his response to a highly pathogenic strain of bird flu detected in poultry flocks located within several counties. Many experts believe the source to be an airborne virus from migrating waterfowl. An airborne virus from wild birds infecting domestic poultry is given urgent and immediate attention.

We would like to see our governor declare a State of Emergency in response to this statewide proposal to disperse untreated liquid manure over fields where people live and breathe. We do not intend to wait for a virulent epidemic among the people of Wisconsin in order to put a halt to a practice that scientific studies have shown exposes rural communities to deadly pathogens.

As members of the Workgroup, each of you will be asked to make recommendations. It's a daunting challenge - facing the industry that has profit at the forefront and the financial power to enforce its will - and choosing the ethical and moral responsibility to the people.

We are pleading for precaution. Many towns around the state are adopting ordinances which ban this riskiest form of manure disposal. It won't happen soon enough. The fate of the people will be determined by the personal integrity of a few. We are told this Workgroup has no authority, but a unanimous consensus would represent a mighty tool against greed.

Please accept personal responsibility for the consequences of your actions as members of this Workgroup. Please see the faces of the future and prevent irreversible damage to the earth's finite resources. We ask that you recommend **abandonment of all forms of spray irrigation systems for liquid manure.**

Among our exceptional and outstanding natural resources are the people of Wisconsin. It's a distinction one hopes to earn in a lifetime.

Sincerely,

Elaine Swanson, Correspondent
Sustain Rural Wisconsin Network (SRWN)
Post Office Box 284
Gays Mills, WI 54631

Attachment: Signature page indicating support of SRWN comments to Professor Genskow and members of the Manure Workgroup asking for **abandonment of all forms of spray irrigation systems for liquid manure.**

Note: Please share with all members of the Workgroup.

CC: Governor Scott Walker
Secretary Cathy Stepp, WDNR
Secretary Ben Brancel, DATCP
Secretary Kitty Rhoades, WI Department of Health Services
Deputy Secretary Kurt Thiede, WDNR
Preston Cole, Chair WI Natural Resources Board
Lee Engelbrecht, WI Towns Association
Stephanie Klett, WI Department of Tourism
Cheryl Burdett, US EPA
Tinka Hyde, US EPA

Signatures below indicate support of SRWN submitted comments to Professor Genskow and members of the Manure Workgroup asking for **abandonment of all forms of spray irrigation systems for liquid manure.**

Food and Water Watch, Washington DC

River Alliance of Wisconsin

Crawford Stewardship Project (CSP)

Margaret Pulera, MD

Bruce Dimick, Criste Greening for Protect Wood County and Its Neighbors

Wisconsin League of Conservation Voters (WLCV)

Mary Dougherty for Farms Not Factories

Susan Turner, co-founder Illinois Citizens for Clean Air and Water

Boerson Farm, Princeton - Certified Organic Produce

The Humane Society of the United States (HSUS)

Jeanine Thomas, president & founder MRSA Survivors Network

Frederic H. Depies, Trust Local Foods

Mark Resch, founder ACCESS of Ripon

Fred Erickson, Erickson Realty LLC of Coloma

Socially Responsible Agricultural Project (SRAP)

Dr. William Iwen for Kewaunee CARES

Kimberlee Wright, Midwest Environmental Advocates Inc. (MEA)

Citizens for Safe Water Around Badger (CSWAB)

Genie Metoyer, Russ Brown - Fresh for Life Certified Organic Farm, Richford

Clean Water Action Council of Northeast WI (CWAC)

Robert L. Wallace, Professor of Biology, Ripon College

Greg Farnham, Commissioner, Lake Sinissippi Improvement District, Dodge County

Judy & Gary Jolin for People Empowered Protect the Land (PEPL) of Rosendale

Jerry Viste, Door County Environmental Council (DCEC)

Friends of the Central Sands (FOCS)

The Cornucopia Institute

Melanie Weibweg, Wildlife Public Trust & Coexistence, Osceola

Kirk & Julia Jiannacopoulos

Lynn Henning, Socially Responsible Agricultural Project (SRAP)
Karen & Fred Wollenburg
Don Ystad for Rome and Saratoga Friendly
Alexis Baden-Mayer, Esq., Political Director, Organic Consumers
Association
Family Farm Defenders
John Filcher, Co-Chairman, Incinerator Free Brown County
Leah Dodge, tribal member, Oneida Tribe of Indians of WI
Patty Loew, member Bad River Band of Lake Superior Ojibwa
The Flying Pig, LLC
Winnebago Audubon Society
Physicians for Social Responsibility Wisconsin (PSR WI)
Ann T. Behrmann MD, Pediatrician, Madison WI and Steering
Committee, Wisconsin Environmental Health Network (WEHN) and
PSR WI
Monica Vohmann MD, Family Physician, Madison WI and Steering
Committee, WEHN & PSR WI
John Bergman, Chairman, Town of Harmony, Rock County WI