



Citizens for Family Farms (CFF) is conducting an aggressive campaign to generate opposition to Bion's proposed environmentally sustainable livestock/renewable energy project. Their activities have included publishing in regional news outlets as well as direct contact with Oswego County elected officials at all levels of government. Their declared mission is to "educate" citizens. **However, they continue to grossly misrepresent Bion's project to all who will listen, while ignoring the actual facts.**

Their arguments are disingenuous at best and serve to seriously mislead the Oswego community. In their letter to the Schroepel Town Board, CFF stated *"we are writing to provide you with names of individuals you can speak with about the negative impacts of the Bion Project."* The letter goes on to say: *"These individuals have all had extensive experience dealing with **similar operations** and the incredibly devastating impacts they have on communities."* Their statement is carefully crafted using the word "similar" in linking Bion to the environmental challenges of existing large scale livestock operations. However, in making their claims, they have intentionally ignored the vast differences between the proposed Bion project and those of existing CAFO's. "Similar" to the Citizens for Family Farms (CFF) is a distinction without a difference, as they proceed to paint Bion's project as "identical" and not "similar".

Let us be perfectly clear: **Bion understands that all livestock production results in nutrient loading to both air and water, and therefore large scale livestock facilities should be required to obtain permits to ensure that the facility uses proper waste treatment and other technologies to meet the same standards applied to any other large industrial activity.**

The purported "experts" for the CFF are individuals who have a history in opposition to Confined Animal Feeding Operations (CAFO's) and can speak with passion and authority about the environmental impacts of these facilities on local communities. Indeed, their concern for adverse impacts based from these traditional operations has support in experience. But it is necessary to note that they have simply not had **ANY** experience (let alone extensive familiarity) with facilities utilizing technology similar to that proposed by Bion! It is the perpetuation of this myth that is most destructive to real dialogue and any honest effort to inform the Oswego community!

To believe their claims about Bion would require accepting the myth that the CAFO's these people are familiar with fairly represent the Bion project. They do not! For starters, one must understand that their collective experience with large scale livestock operations is based on facilities with no regulated livestock waste treatment technology. A single beef cow produces the waste equivalent of about 10 humans. Bion has proposed individual livestock facilities with a minimum of 14,400 beef cattle per individual location or the waste equivalent of 144,000 humans. One need only imagine the impacts on a community from a housing development for 144,000 humans with no effective sewer and waste treatment! But these are the impacts that CFF's purported experts insist on warning us against!

The problem (and the reason we accuse CFF of being disingenuous) is that their comparison is bogus and they know it. Bion's proposed project will treat the equivalent of 144,000 humans in waste load with an effective sewer and waste treatment system (otherwise known as Bion's patented and proprietary waste treatment technology). **And, most importantly, Bion has agreed to permit this project under NYS's most stringent environmental permitting standard, used for all large projects --the State Environmental Quality Review (SEQR).** This is the law that was put in place by the environmental community in the late 1970's to protect communities by requiring appropriate safeguards against the environmental impacts from proposed projects. None of the CAFO's that CFF "experts" speak about have been subject to SEQR or an equivalent process, nor are they regulated under the strict permits to which Bion will be subjected. They are all fundamentally exempted under various 'right to farm' state laws or their equivalent and, therefore, remain free from any such environmental regulations or oversight. And to be sure, none of them could successfully submit to the NYS SEQR process through which Bion's proposed project will proceed.

The CFF refers to "similar" facilities but bases its opposition on the false representation that they are "identical". They refuse to acknowledge the very real and important differences. The environmental waste issues which they raise will all be addressed under SEQR, which will include review of location specific impacts such as traffic, water discharge standards, air emissions and odor impacts, etc. **An honest debate about a project subject to SEQR --before the SEQR review even begins-- would not focus on these impacts because they will all be rigorously addressed in the SEQR process.** By agreeing to the SEQR process, the project simply becomes another transparent industrial proposal with the benefit of providing hundreds of green jobs. Most importantly, this will be the first large scale livestock herd in the nation that will be permitted under the same strict standards applied to all large scale economic activities. As a result, it will be required to report on its discharges and will be subject to the same enforcement as any other large scale economic activity.

Organized handwringing and fear mongering about environmental impacts doesn't really help to educate the community, because project opponents continue to ignore the fact that the entire project will be governed by SEQR through which all legitimate environmental concerns must be addressed. Three nuclear power plants were permitted under this process. The ethanol plant that is providing the local agricultural community with a large market for its corn production was permitted by this process. The same NYS gold standard for environmental review that permits nuclear power plants and large scale industrial facilities is clearly capable of dealing with cattle waste issues.

Unfortunately, the CFF misinformation campaign (based on environmental issues to be regulated under SEQR) serves for the most part as cover for a social agenda that may not resonate as well in the community at large if honestly examined. Much of the opposition appears to be about "not in my backyard" (NIMBY) and "animal rights" issues among others. To be sure, these are legitimate issues about which many people can have differing opinions! But the CFF should have the moral and intellectual honesty to advance their real agenda so that an informed decision can be reached by the community. Instead they resort to fear mongering about environmental issues (that will be addressed in SEQR) and attempt to intimidate public officials by packing small venues such as Town meetings.

Meanwhile, CFF has represented that they have over 700 signatories online. To be clear, as of August 12, a review of website signatures revealed that 316 appear to be from residents of Oswego County with 16 listing no address; the almost 400 remaining names appear to be from outside of Oswego County!

Many have asked Bion why we seek support for the project prior to actually proposing a specific site and filing an environmental impact statement? The answer is very simple: this project will require a long term good faith effort on everyone's part to be successfully implemented. We estimate that it will take 12-18 months to fully permit followed by 18-24 months to complete construction and populate the initial herd. Prior to committing to the investment required by such an undertaking, it is necessary for Bion to know if the project will be supported by the community if it successfully meets community standards as determined through SEQR and other appropriate public review processes.

During the permitting period, Bion will be contracting with the local dairy community to raise young stock and for farmers to provide inputs. The requirements for hay alone will call for close to 25,000 acres of production (not including the future opportunity to raise biomass crops for the renewable energy plant that may exceed the haylage requirements), produced on marginal farmland that for the most part is no longer in production. These facts need to be understood by Oswego County because the positive economic impact of this project on the local agricultural community will be significant throughout the county and regionally.

Bion seeks an honest debate from the CFF and the entire Oswego community, one that will enable the community to reach an informed decision. We believe Bion offers the community an irreplaceable (yes irreplaceable), environmentally sustainable opportunity that will add to Oswego's existing agricultural community and work force. **In the end, the entire community must determine if the social agendas of the CFF are in the greater public interest and should be adopted as Oswego's public policy.** In the end, the community needs to decide --but that process needs to include the representation of a full range of community interests that will be impacted, including the agricultural community and the business community (including the real estate industry, both commercial and residential, merchants, shopkeepers, auto dealers and repair facilities, supermarkets, cafes and restaurants, equipment suppliers, and more). And this decision also needs to consider the interests of the unemployed, the underemployed and the future generations that will leave the area if the economy cannot provide employment opportunities.

The greater Oswego community has the right to determine, if it so chooses, that despite the safeguards provided by SEQR and all other standing public review processes --even assuming that all environmental and other community standards can be met-- that consideration of other "social" and "NIMBY" type issues will take precedence in Oswego County and the Bion project should look elsewhere. Bion respects that right. That is essentially the decision before the community. To do so, however, would elevate a standard that has not otherwise been uniformly applied to all proposed economic activities. Would such a standard be applied to a new nuclear power plant? Just what would be the true requirements of this new standard? Such discriminatory regulation would represent a slippery slope with significant unintended consequences. Companies seeking sites in upstate New York need to understand the requirements for development and if Oswego County has a SEQR "**plus**" requirement, that needs to be clearly defined and understood. An honest and clear answer that defines what is acceptable

to the community (and what is not) can be respected by all and used by the business community in making their regional business plans. SEQR compliance was the basis of Bion's seeking to locate a facility in upstate NY. Are there additional requirements?

Bion's request is simple: we ask if the community leadership represented by the legislature will welcome a project with its economic benefits based on successfully meeting environmental and other community standards as applied to existing regional economic activities through the full scope of SEQR and all other appropriate regulatory reviews. Our request is **not** project approval; it is asking the legislature for a clear definition of the rules of engagement for this project to become a reality. All of the hurdles of the SEQR process (and all other public review processes) remain before Bion and we fully appreciate that every aspect of these processes will be rigorously scrutinized. The initial requirement will be Bion's completion of its Pennsylvania project which will provide the community with the actual data to be used in the permitting review. That is step one in moving the project forward, once the legislature defines the rules of engagement.

We will continue to make ourselves available to answer project related questions from county officials and from the community at large as they are posted on our website:
<http://bionoswegoproject.com/>.