

**From:** Ginny Masullo [mailto:masullo.ginny1@gmail.com]

**Sent:** Monday, June 23, 2014 3:21 PM

**To:** Reg-Comment

**Subject:** Ban of medium and large CAFOS under resg 5 and 6 in Buffalo River Watershed

From Ginny Masullo  
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Fayetteville AR 72704

I support the amendments to regulations 5 and 6, banning medium and large Concentrated Animal Feeding Operations(CAFOs) in the Buffalo National River Watershed.

**In a word CONCENTRATION within one facility and CONCENTRATION of such operations within geographical areas, especially highly sensitive areas such as the Buffalo River Watershed is the main problem. I submit the following information to support my comment.**

I am registered nurse who has researched the scientific literature on the issue of swine CAFOs before deciding my stance. I am submitting as part of my comments, the project of the Pew Charitable Trusts and John Hopkins Bloomberg School of Health. This project is an evidence based review. - See the entire executive summary of the Pew Commission 's Report on Industrialized farming :

[http://www.pewtrusts.org/~media/Assets/2008/PCIFAP\\_Exec-Summary.pdf](http://www.pewtrusts.org/~media/Assets/2008/PCIFAP_Exec-Summary.pdf).

**The Pew study includes review of 40 years' worth of peer-reviewed empirical studies on effects of industrial livestock production, including work by the U.S. Department of Agriculture, the University of Iowa, Iowa State University, Ohio State University and the University of Missouri.**

The evidence is abundant and clear in this one study not to mention the abundance of other studies on this issue. Until the unintended, but never the less real, problems of industrialized farming are squarely addressed, it would be wise to consider the growing evidence of harm to the environment and to public health as you consider your decision regarding the ban of medium and large CAFOs in the sensitive karst terrain of places like the Buffalo River Watershed. The additional works of hydro geologists and geologists such as Dr. Brahana 's demonstrations of how fast and unpredictable the dye travels in karst terrain add to the substantial and substantive evidence that supports the proposed ban.

Below are some quotes from the said Pew Commission's Report. Please note that the Pew report uses Industrialized Farm Animal Production ( IFAP) which is a different acronym for Concentrated (or confined) Feeding Animal Operation(CAFOs)

*"Over the last 50 years, the method of producing food animals in the United States has changed from the extensive system of small and medium-sized farms owned by a single family to a system of large, intensive operations where the animals are housed in large numbers in enclosed structures that resemble industrial buildings more than they do a traditional barn. That change has happened primarily out of view of consumers but has come at a cost to the environment and a negative impact on public health, rural communities, and the health and well-being of the animals themselves."*

*"In the IFAP system, each individual farm animal requires less feed, produces less manure, and reaches market weight far faster than farm animals produced on the small family farm of 50 years ago, which might suggest a lesser impact on the environment. Yet IFAP stands in sharp contrast to the more pastoral animal farming methods it has replaced by virtue of the emphasis placed on producing large numbers of animals in close confinement, as rapidly and as cheaply as possible. Until IFAP, agricultural practice and animal husbandry evolved over more than 10,000 years, and proved to be more or less sustainable as measured by the agricultural inputs and outputs and ecosystem health. IFAP systems, on the other hand, are a recent development, dating back approximately 50 years. Rather than seeking a balance between the natural productivity of the land to produce crops to feed animals and absorb wastes produced by those animals, the industrial model concentrates on growing animals as units of protein production. Inputs of feed and feed additives containing antimicrobials ensure that the animals make it to market weight in the shortest period of time possible.*

*Both animals and their waste are concentrated and usually exceed the capacity of the land to produce feed or absorb the waste.*

*Consequently, the rapid ascendance of IFAP has produced an expanding array of deleterious environmental effects on local and regional water, air, and soil resources. The Commission's recommendations include focusing on appropriate regulation of IFAP facilities in order to prevent further degradation of air, water, and soils, and to minimize the impact on adjacent communities."*

I submit here the entire executive summary as part of my comments:

**- See the entire executive summary of the Pew Commission 's Report on Industrialized farming :**

[http://www.pewtrusts.org/~media/Assets/2008/PCIFAP\\_Exec-Summary.pdf](http://www.pewtrusts.org/~media/Assets/2008/PCIFAP_Exec-Summary.pdf)