

-----Original Message-----

From: Stewart J & P [mailto:jampack1@mac.com]

Sent: Tuesday, June 10, 2014 4:59 PM

To: Reg-Comment

Subject: Ban on Medium and Small Swine CAFOs in BNR watershed

To Doug Szenher, ADEQ Public Outreach and Assistance, Division:

This letter is in support of a Rule Making proposal to ban medium and large swine CAFOs in the Buffalo River Watershed for the reasons that follow.

Protection from economic loss of tourism, jobs, and property devaluation:

The Buffalo National River area is a place of scenic beauty, historical, scientific, and recreational interest offering unusually pure waters and clean air to people from all over the US and even internationally. Canoeists, hikers, hunters, swimmers, horseback riders, botanists, birders, photographers and others, bring in \$43.7 million to communities along the river and give more than 600 people employment. Odor and water pollution from medium and large sized CAFOs would risk harming the tourism industry. Real estate agents have already reported concerns from prospective property buyers about the one large CAFO in the area. No one wants to live near a CAFO, thus property loses value, and tax income is lost. Banning medium and large CAFOs in the BR watershed will reduce the risk of harming the characteristics that attract people and money to the area.

Reduction of health risks:

In addition to health hazards due to ammonia, hydrogen sulfide, nitrous oxide and other toxins emitted with odors emanating from confined animal waste, both water and air can carry bacteria, and other disease organisms from untreated animal waste. Reports have recently been issued about the increasing number of human deaths from untreatable bacterial diseases as a result of antibiotic resistance, which evolves from over-use of antibiotics, 70% of which are used in large scale animal agriculture. On the porous karst topography of the Buffalo River Watershed, concerns about water pollution are multiplied. Banning medium and large CAFOs will reduce risks of disease.

Ecological sustainability and actual costs:

Carrying Capacity refers to the number of animals which a parcel of land can support. When carrying capacity is exceeded, biological recycling processes break down. Excess waste becomes a pollutant rather than a fertilizer. Energy input is required to treat it, or truck it out. Food must be trucked in. These processes add cost, not only for the farmer, but for the community; costs of infrastructure, road upkeep, health costs from added pollution. These external costs are passed on to the tax payers. Ignoring basic ecological principals thus becomes an economic issue, for the farmers and for tax payers. A traditional farm, with it's balance of crops and animals, is a more sustainable form of agriculture. Larger operations first appear to be more profitable, however, when all expenses are added in, the profit margin decreases.

Banning medium and large CAFOs in the BR watershed will protect the Buffalo River from pollution, the community from health problems, and farmers and tax payers from economic losses.

Thank you for your consideration of the above comments.

Pamela E. Stewart