

Elizabeth Sugden Public Comment

7/18/07

G.S. 7/26/2007

As providers of health care to residents of Jerome County and the Magic Valley, we have deep concerns about adverse effects on public health related to the unprecedented development of industrial-scale Concentrated Animal Feeding Operations in our area.

These include, according to the EPA, facilities with more than 1000 beef cattle.

We are alarmed by rising rates of foodborne illness throughout the country related to cattle borne disease. There have been 76,000 cases of E. Coli 0157:H7 yearly with 61 annual deaths. Recently, 15 cases occurred in the Minidoka area resulting in 5 cases of hemolytic uremic syndrome(HUS) in young children. HUS is the leading cause of kidney failure in children and the leading cause of HUS is E. Coli 0157:H7. Increasing numbers of this disease are being reported in food crops such as lettuce, spinach, apples. These outbreaks have been linked to the contact between manure from cattle operations and contaminated water runoff which affected nearby crops. Other pathogens from CAFO associated waste include Salmonella, Campylobacter, Cryptosporidium, Listeria. The very young and very old are susceptible to more severe disease and fatal outcomes.

There is good evidence that antibiotics are commonly used in CAFO operations as a routine additive. These routine, nontherapeutic uses account for 13 million pounds of antibiotics annually compared to 3 million pounds prescribed for humans. The emergence of bacteria resistant to multiple antibiotics appears to be highly correlated to these practices.

Hormones are sometimes added to feed to promote growth and may be distributed in waste onto the land and water promoting risk to humans.

CAFO's generate an estimated 575 billion pounds of animal manure yearly. In our area, this waste remains untreated and is spread on fields or is left in open piles without liners to be spread by the wind and water or to leach towards the aquifer. In addition to posing a risk for spreading pathogens and disease into the water supply, there is risk of accumulation of excess nitrogen which can be detrimental to the development of the nervous system in babies. There appears to be little local data to determine whether or not the amount of manure generated by our CAFO's exceeds the carrying capacity of the agricultural land on which it is being spread. The odor and amount of piled up manure one sees everywhere suggests that this capacity is being exceeded.

Odor is a serious problem and is a marker for poor control of waste. There are toxic chemicals that produce these odors to include hydrogen sulfide, ammonia, methane. Other potentially toxic contaminants from aerosolized CAFO manure waste include organic dust, bacterial endotoxins, molds. Many of these constituents are known to be airway irritants and allergens. We take note of a recent article in the Times-News of a national scientific study now underway to more fully evaluate the nature of the risks of aerosolized CAFO wastes and to better determine how they can be measured and controlled.

We are alarmed that Jerome County has no accurate accounting of the number and concentration of cattle within it's jurisdiction. There is no data available to determine the frequency with which antibiotics or hormones are used in local CAFO's. Scientific data is lacking at all levels to help determine safe levels of exposure to airborne waste products and to assess the effects of excess odor on human health and happiness. We are concerned about the protection of safe and uncontaminated water supplies. Water is a scarce and precious commodity and the world's most limited natural resource.

As a result of these concerns, we echo the sentiments of the American Public Health Association who called for a moratorium on New Confined Animal Feeding Operations in 2004.

We urge the Jerome County Commissioners to continue an indefinite moratorium on new CAFO's in Jerome County. We urge Jerome County and Idaho State government to gather data on the number and distribution of cattle in the county, and to evaluate for routine useage of antibiotics and hormones in cattle feeding. We urge studies that evaluate the impact of CAFO's on workers and those living nearby in terms of respiratory illness symptoms and reactions to odors both from a physical and psychological standpoint. We urge county officials to await results of recently initiated national studies of the airborne wastes from CAFO's before introducing additional facilities. We urge the development of mechanisms for enforcing current ordinances designed to prevent cross-contamination of water supplies and agricultural crops for human consumption with manure waste.

I n particular, we oppose the introduction of a new CAFO proposed for Jerome County of 13,800 cattle based on the above public health concerns.

Sincerely

Elizabeth H. Sugden MD

James Lohmann MD

James Irwin MD

Lori Butters RN

Jonathan Housely MD

Cindy Lohmann

Alan Stevenson

- (1) Elizabeth H. Sugden
- (2) James Lohmann MD.
- (3) James S. Irwin MD.
- (4) Lori Butters RN
- (5) Jonathan Housely MD
- (6) Cindy Lohmann
- (7) Alan Stevenson

Alice Trabert FNP (8) Alice Trabert FNP

(10) SANDRA SCHAEER (9) Sandra Schaeer
Phil Meyer, RET

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11) LINDA HELMS *Linda Helms*

12) Robert Gruver *Robert Gruver*

13) Marjorie Masen RN *Marjorie Masen*

14) A. Hawk *A. Hawk*

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16) Joyce Martin - *Joyce Martin*

17) Dr. Claudia R. Braun *Dr. Claudia R. Braun*

18) Rowan Beons - *Rowan Beons*

19) Toni Sensen - *Toni Sensen*

20) Myrna Walker *Myrna Walker*

(21) *John* ~~John~~ *JOHN HAWKINS*

(22) Arlene G. Gray *Arlene G. GRAY M.T.*

(23) *Paul H. Brown* *Paul H. Brown*

(24) Vicki Shapiro MD. *Vicki Shapiro MD*

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