



United States Department of the Interior



National Park Service

Midwest Region
601 Riverfront Drive
Omaha, Nebraska 68102-4226

H34 (MWRO-CR/HNRP)

0 8 NOV 2007

Mr. Roger A. Hanson
Natural Resources Conservation Service
U.S. Department of Agriculture
Parkade Center, Suite 250
601 Business Loop 70 West
Columbia, Missouri 65203

Dear Mr. Hanson:

The National Park Service (NPS) would like to thank you for the close attention that the Natural Resources Conservation Service (NRCS) has given to the proposal by Gessling Farms Limited Liability Company to construct a confined animal feeding operation (CAFO) in Saline County, Missouri. Our Agency has worked with stewards of the Village of Arrow Rock, a National Historic Landmark (NHL) district located in Saline County, for several years to preserve this valuable historic resource as well as the George Caleb Bingham House, an individual NHL property located within the village. We are concerned about the possible adverse effects that the proposed Gessling CAFO may have on these nationally significant resources.

The NRCS conducted an initial study of the possible negative and harmful effects of the Gessling CAFO because its owner applied to the Agency for Federal funding, in the form of loans secured through the Environmental Quality Incentives Program to help finance the feeding operation. Findings of the study were presented in a preliminary report issued on September 19 and at an informational meeting held in Columbia, Missouri, on October 11. They suggest that odor was the only possible negative impact posed by the Gessling CAFO and that would pose no adverse impact on the two Arrow Rock NHLs because the historic properties fall beyond the project's area of potential effect (APE), which was determined to extend approximately 1/2 mile from the CAFO. The scope of this study was limited, however, by the consideration of odor, alone, as a potential negative impact and by the implementation of only one predictive model that suggested the impacts of the CAFO would be limited to a distance of 1/2 mile. This analysis did not fully take into consideration other possible effects of the CAFO on historic resources near the proposed CAFO site.

The NPS disagrees with the findings in the preliminary report and requests that the NRCS reconsider them in light of other scientific models, such as the Minnesota Odor from Feedlots - Setback Estimation Tool model, available to evaluate the possible negative effects that CAFOs pose to humans and their environment, including the full range of historic resources beyond a limited

**TAKE PRIDE[®]
IN AMERICA** 

1/2-mile range from the feeding operation. We would encourage the NRCS to consider evidence submitted by the Washington University School of Law Interdisciplinary Environmental Clinic that suggests that the preliminary NRCS study did not take into account the full potential impact of the Gessling CAFO on a variety of historic resources within the APE and more importantly, recommends application of more rigorous models that could be used to predict the level of emissions, odors, and adverse health effects on nearby communities and historic resources. This would require consideration of the cumulative effects of the CAFO on the environment and reconsideration of the APE in light of variable weather conditions that could carry emissions and odor beyond a 1/2-mile range.

Thank you for your careful consideration of the possible harmful impact that this farm operation may pose to two NHLs in central Missouri: The Village of Arrow Rock, and the George Caleb Bingham House. The NHLs are places deemed to have paramount importance in the illustration of broad patterns of American history and its diverse peoples. Fewer than 2,500 properties have gained this high distinction and only 36 are located in Missouri. Please contact Rachel Franklin Weekley at 402-661-1928 or via e-mail at rachel_franks-weekley@nps.gov regarding further discussion about the potential negative effects that the Gessling CAFO may have on these unique resources.

Sincerely,



Ernest Quintana
Regional Director

cc:

Mr. Don Klima, Director, Office of Federal Agency Programs, Advisory Council on Historic Preservation, Old Post Office Building, 1100 Pennsylvania Avenue, NW., Suite 809, Washington, D.C. 20004

Mr. Mark A. Miles, Deputy State Historic Preservation Officer, Missouri Department of Natural Resources, P.O. Box 176, Jefferson City, Missouri 65102

Mr. Royce Yeater, Director, Midwest Office, National Trust for Historic Preservation, 53 West Jackson Boulevard, Suite 350, Chicago, Illinois 60604

Mr. Dennis Gessling, Rural Route 1, Box 2025, Marshall, Missouri 65340

Mr. Jeff E. Browning, Great River Engineering, Inc., P.O. Box 29, Bowling Green, Missouri 63334

Dr. Thomas B. Hall, III, President, Friends of Arrow Rock, P.O. Box 124, Arrow Rock, Missouri 65320

Ms. Kathy Borgman, Executive Director, Friends of Arrow Rock, P.O. Box 124, Arrow Rock, Missouri 65320