

From: Gordon Watkins [mailto:gwatkins@ritternet.com]
Sent: Thursday, June 26, 2014 7:14 PM
To: Reg-Comment
Subject: Public Comment, Reg 5 & 6 rule making proposals

The following statement is submitted on behalf of the Buffalo River Watershed Alliance in response to the request for public comments regarding the 3rd party rulemaking proposal to prohibit the ADEQ Director from issuing Regulation 5 permits for Confined Animal Operations, and Regulation 6 permits for Concentrated Animal Feeding Operations, for facilities in the Buffalo National River Watershed with either 750 or more swine weighing 55 pounds or more, or 3,000 or more swine weighing less than 55 pounds.

The Buffalo River Watershed Alliance asks that the record reflect our full support of the proposed changes to Regulations 5 and 6 as they are currently written.

We agree with and support the Arkansas Pollution Control and Ecology Commission's position on the matter as stated in Minute Order No. 14-19:

“The Buffalo River's watershed is located in a karst region. Karst geology is comprised of an abundance of limestone. Limestone is typically porous rock that can form pathways resulting in rapid discharges into nearby ground and surface water resources.

The Buffalo River's watershed provides habitat for numerous species of trees, plants, birds, game, and aquatic life. It is estimated that more than seven-hundred and fifty-thousand (750,000) people visit the Buffalo River, and the Buffalo National River Park area, to fish , float, swim , hike, camp, and engage in other recreational activities.

Swine CAFOs and swine confined animal operations have a propensity to produce large amounts of manure and wastewater annually. The manure and wastewater from a swine CAFO and swine confined animal operations are typically land applied. Because General Permit ARG590000 does not distinguish between karst regions and other regions of the State, and because Commission Regulation No.5 and General Permit ARG590000 do not expressly limit swine CAFOs and swine confined animal operations from being established in the Buffalo River's watershed, the Commission

finds that a proliferation of medium and large swine CAFOs and swine confined animal operations in the Buffalo River's watershed will pose an unnecessary risk to the public health, safety and welfare which requires a change in existing rules and an immediate moratorium on the establishment of any new medium and large swine CAFOs and medium and large swine confined animal operations in the Buffalo River's watershed over the next one-hundred and eighty (180) days.”

We fully support a permanent ban on medium and large swine CAFOs in the Buffalo River watershed as well as other restrictions as described in the proposed changes.

Thank you for your consideration and for the opportunity to submit this comment.

On behalf of the Buffalo River Watershed Alliance

Gordon Watkins, President

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