

From: [Fran Alexander](#)
To: [Water Draft Permit Comments](#)
Subject: Comment To Draft Renewal CAFO General Permit ARG590000
Date: Thursday, April 14, 2016 12:03:05 AM

Comment of: Fran Alexander
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Re: General Permitting of CAFOs Renewals

Since no two CAFOs are alike nor will be built in exactly the same locations geologically, hydrologically, or even socially (in relative proximity to human populations), then no general permit can reflect nor describe the needed safeguards and conditions of design or operation of a facility. Therefore, it is practical and honest in dealing with permitting of such facilities that *only individual permits are appropriate* to address the unique conditions and issues of uniquely located CAFOs. I request that individual permits be the only permitting method used in swine CAFO permitting processes.

“Acts of God” and/or Mother Nature have a way of making fools of humans and our arrogant ways. There is no way to over-engineer safety perimeters around waste holding ponds. If back-up levees added to front line levees are built to contain any overflow from ponds in the case of extraordinary weather, the cost will be tiny in contrast to the cost of overflow. (Ounce of prevention worth a pound of cure—think Flint, Michigan).

The weather events of the last few years globally have made it clear that weather predictions are a roll of the dice, and so more boundaries around holding ponds should be erected.

An accidental spill protocol of action steps and procedures should be in place for all CAFO facilities that can be initiated immediately when needed.

Thank you,

Fran Alexander