

From: [Ann Mesrobian](#)
To: [Reg-Comment](#)
Subject: Buffalo moratorium
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I support the changes proposed by ADEQ to Rule 5 and Rule 6 that would institute a permanent moratorium on issuance of permits for medium and large swine CAFOs in the Buffalo National River watershed.

The Buffalo National River is highly unsuitable for this kind of facility for many reasons, including but not limited to the following:

The volume of swine sewage produced by facilities like C&H CAFO is enormous, with each animal producing as much waste as up to five people. When the waste is applied on fields in the volume and manner these facilities utilize to get rid of it, it overwhelms the thin soils in the watershed that cannot possibly absorb or process the load of nutrients they receive. The porous karst topography underlying the watershed allows excess nutrients to easily enter the groundwater and move quickly underground, then emerge in seeps and springs that feed the river. Along the way, the excess nutrients contaminate drinking water wells and springs that local residents and neighboring farms depend upon.

Legacy phosphorus lingers in caves and river sediments, leading to recurring algae blooms that outlast the life of the source CAFO.

It has been admitted that allowing this facility to locate in the vulnerable watershed of our nation's first National River was a mistake. The presence of a swine CAFO in the watershed of our country's first National River has given the "Natural State" of Arkansas a black eye and has been an embarrassment, apparently upholding the foolish, backwards mentality and image our state has trouble shaking off. We are neither foolish nor backwards. We can and must do better than this.

It is imperative that a permanent moratorium on such facilities is instituted to ensure that this mistake is never repeated.

Sincerely,

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