

Ann Mesrobian

Re: Reg. 5 and 6 Revisions--Permanent Moratorium on swine CAFOs in Buffalo National River watershed

I support a permanent, enforceable moratorium on all swine CAFOs in the Buffalo River Watershed and I urge ADEQ and all relevant agencies in Arkansas to adopt such a rule in perpetuity.

It is abundantly clear to me and an overwhelming majority of the public that when lobbying for designation of the Buffalo as our country's first National River, the founders intended not only to protect the river from yet another Army Corps of Engineers dam, but also to preserve the quality of the water within its banks. Without clean water in it, none of the recreational uses presently supported by the river would be possible. Nobody visits a polluted river on holiday.

I assisted with ongoing water quality monitoring conducted by volunteers from Buffalo River Watershed Alliance and the dye trace studies and additional field work performed by Dr. Van Brahana's Karst Hydrology of the Buffalo National River team. I am familiar with the work done by BCRET.

Local residents already know, and most visitors to the Buffalo National River quickly learn, that the karst terrain underlying its watershed is highly vulnerable to the kind of leakage and seepage all CAFOs emit. Yet somehow this fact was ignored by the U. S. Farm Bureau when that agency enthusiastically encouraged construction of C&H CAFO in the first place, using federally-insured Small Business Administration loan(s). Presence of karst in the region was subsequently denied by regulators when they granted C&H their permit in 2011. In the meantime, the damage has spread far beyond the property housing the facility itself.

Present regulations for CAFOs like C&H allow vast quantities of untreated raw swine sewage every bit of what the 3500 resident swine produce-- to be spread on nearby receiving fields.

This accepted practice may be safe enough in areas without vulnerable hydrogeology that have plenty of deep, nutrient-depleted soils capable of absorbing and utilizing all those excess nutrients. But in the thin soils overlying sensitive karst terrain of the Buffalo National River watershed, the practice backfires. Overwhelmed by nutrient loading, C&H's over-saturated receiving fields pass some excess nutrients into runoff while the rest seep through fractured karst and enter the groundwater, en route to the Buffalo. This creates a persistent issue of legacy phosphorous in the river. Long after C&H CAFO has closed its doors, we will endure years possibly decades--of hyper-charged algae blooms that make the river seasonably unusable. We do not know how long it will take for all the phosphorous to be consumed and this is from just one CAFO in operation for less than 8 years. This is why a permanent moratorium on such facilities in the Buffalo River Watershed is both appropriate and necessary.

The Buffalo National River is highly valued and internationally revered as a wilderness destination, placing Arkansas on the bucket list of many nature tourists. The Buffalo National River is largely recognized as THE economic driver for the region and is worth protecting from this preventable pollution.

Allowing one CAFO in the watershed was a profound mistake that even the regulators and at least two Arkansas governors regret. Clean, free-flowing rivers will only increase in value as they

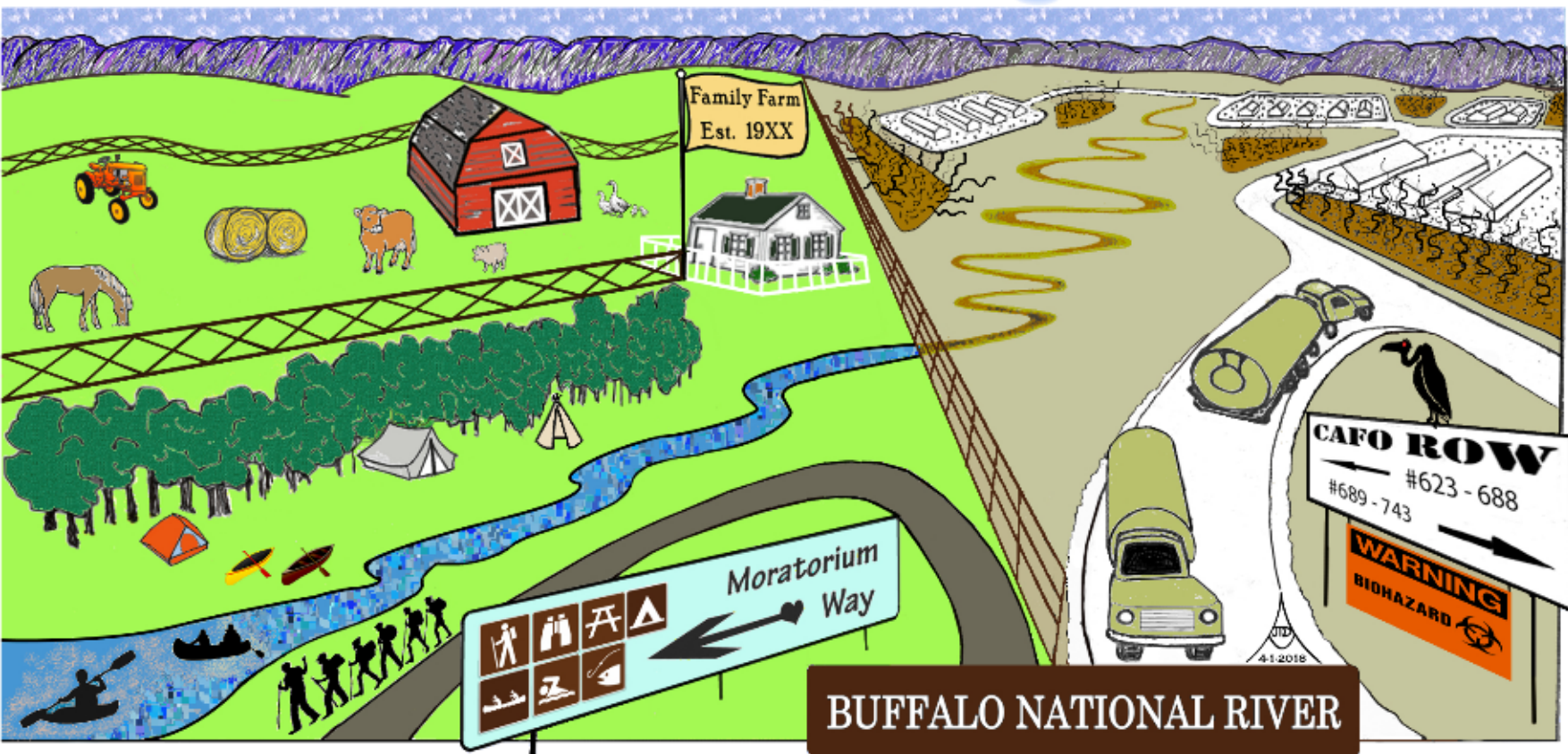
become ever more scarce.

This is a new decade and time is of the essence. Let's make the right choice and use 2020 FORESIGHT to protect this natural jewel for future generations. The Buffalo National River deserves protecting. It's time to make those protections permanent.

Sincerely,

Ann Mesrobian
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January 20, 2020

TIME TO CHOOSE!



BUFFALO NATIONAL RIVER