

From: [Duane Woltjen](#)
To: [Reg-Comment](#)
Subject: Buffalo River watershed moratorium Rule 5.901
Date: Saturday, September 21, 2019 9:58:12 AM

We support the adoption of Rule 5.901 in spite of obvious inadequacies.

As well intended as the prohibition (A moratorium is temporary by definition, and the rule reads as a prohibition, which we hope it is.) may be, we are acutely aware that it does not begin to address the fact that there can be any number of 749 swine of 55 pounds or more swine operations in the Buffalo River Watershed, and there is no prohibition against spreading the manure in the manner of C & H and poultry operations---so the protection provided is precious little at best. Likewise there is no prohibition against importing manure into the Buffalo watershed from swine operations. Chicken manure can still be spread in the watershed to contaminate the groundwater and the river. There is no prohibition against any number of neighboring swine operations of 749 or fewer swine from using a collective sewage lagoon and manure spreading operation such that the economies of scale of medium or large scale CAFOs can be derived. There are probably other get-arounds that the ever inventive operators will deploy, just use your imagination..

That considered, we want to make it clear that the Buffalo River is practically without protection in spite of the 5.901 protection or intentions.

We want and expect real and perpetual protection of watershed USGS Hydrologic Unit Code 11010005 by the State thru PC&EC and ADEQ. Please reply with your proposals for addressing these issues. Thanks.

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