

From: [Ginny Masullo](#)
To: [Reg-Comment](#)
Subject: PERMANENT MORATORIUM ON DEVELOPMENT OF SWINE CAFOs IN THE BUFFALO RIVER WATERSHED
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PERMANENT MORATORIUM ON DEVELOPMENT OF SWINE CAFOs IN THE BUFFALO RIVER WATERSHED

I applaud and support the call for a permanent moratorium on swine CAFOs in the Buffalo River Watershed. 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 soils in the Buffalo watershed are thin and cannot contain the large amounts of animal waste that are produced by even a single medium CAFO. Groundwater flow direction and volumes are unpredictable in the watershed's karst terrain.,

Already, high counts of phosphorus are lodging and accumulating in gravel bars downstream from the only swine CAFO in the watershed. These deposits will release phosphorus for years and years.

Therefore, a concern remains that there will also be limit to the number of permits for small swine CAFOs in the watershed. A proliferation of small ones, used as a loop hole, will hopefully be avoided.

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