**I would like to thank Governor Hutchinson and the Commission for initiating the necessary steps to protect the Buffalo River. I fully support the changes proposed by ADEQ to Rule 5 and Rule 6 that would establish a permanent moratorium on issuance of permits for medium and large swine CAFOs in the Buffalo National River watershed.**

* The watershed is that of a National River (America’s first National River) and deserves not only Federal protection, but as the guardian of this unique treasure our state’s protection. Arkansas must share this responsibility and will with pride, diligence and a total commitment. The economics of that protection and preservation will offer a sustainable long-term yield, not only for tourism, but provide a healthy environment for many species including humans that live and visit that region. Protect now for all, pass on to future generations so they will have something of such natural beauty (value) they will continue this protection as the “norm”. The Buffalo River is worth protecting! It is not a water theme park that can be built in other locations. So please make a **permanent moratorium on issuance of permits for medium and large CAFOs in the Buffalo National River watershed.**
* The area is karst which makes it at extremely high risk to the large volumes of animal waste applied to fields and pollutants from Confined Animal Feeding Operation (CAFO). There are numerous documented fractures and joints, caves, sinkholes and springs that make up this region. The groundwater routes are unmapped and unpredictable at best, and not visible from the surface. Several dye tracing studies in the watershed over the last few decades by independent professional scientific experts have documented injection water movement from say, that location to the other dye receptor locations, both close and distant locations often spread out spatially for miles, often very rapidly transported. The groundwater paths do not always follow surface water streams. Topographical or other geological “surface” maps may only “hint” of possible underground pathways with surface streams being labeled names like “Dry Branch”, “Dry Creek” and “Cave Springs Branch” as seen on the Mt. Judea Topographic map for example. Underground movement of surface applied CAFO animal waste can travel beyond the waste spreading fields to the waters of the state and in this case, the Buffalo River.
* Waste applied from CAFOs to pastures using the Arkansas Phosphorus Index (API), allows build-up of phosphorus in soils and fails to account for groundwater pathways that can contaminate the river. The API fails to account for karst, or subsurface geological risk factors when determining the risk of waste applications pose to waters of the state. The API allows distribution of phosphorus in excess of crop removal.
* Future permits by state agencies should have proper public input to avoid Taxpayer bailouts.

Sincerely,

John Murdoch Geologist

Wesley, Arkansas (09/23/2019)