

**From:** [Jack and Pam Stewart](#)  
**To:** [Reg-Comment](#)  
**Subject:** Permanent Moratorium on Medium and Large Swine CAFOs in Buffalo National River Watershed  
**Date:** Saturday, September 7, 2019 3:31:46 PM

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## Comment to ADEQ:

The Buffalo River Watershed requires a permanent moratorium against CAFOs and other polluting industries in order to protect the river's waters. Reasons to support the moratorium are:

The watershed topography is based on limestone (karst) which is easily dissolved, containing cracks, caves, and fissures providing unfiltered pathways for pollutants to enter the river.

The very caves, springs and waterfalls resulting from the karst and making it vulnerable to pollution, are what bring tourists to Buffalo River country.

This underlying topography of the area was not considered in the initial permit issued to C&H, (in part because there was no local notification of the project).

Large amounts of hog food have been brought into the watershed from outside, and the resulting digested waste has been stored in clay-lined lagoons expected to leak up to 5000 gallons/day with the remaining untreated sewage spread as "fertilizer" on fields also within the watershed.

The problem is that many fields don't require or take up the "fertilizer". This excess phosphorus runs off surface soil in rains or is leached through the thin soil and porous rock layers, causing streams and river to be over fertilized, resulting in excess algal growth, followed by eutrophication, dying of fish, mussels, and water insects.

People who love nature and wilderness will always want to be near the river. The Buffalo River National Park should be an area for learning what pure waters and protected watersheds can provide. In many parts of our country, as in NJ where I grew up, no streams were safe for swimming or even wading. People are willing to travel far to find a river with extra ordinarily pure water, such as the Buffalo. The watershed gains importance as population expansion increases the value of such places.

While human enjoyment of the Buffalo may be the most obvious reason to protect it, the watershed area and river provide valuable health services. Native trees and plants provide for pollinating insects needed for crops, as well as erosion control, food for fish and frogs, birds etc. They produce oxygen, and modify weather systems. Soil bacteria and fungi along with insects recycle wastes and return nutrients to the soil.

These are just a few of the reasons that the country's first National River, the Buffalo, requires a permanent moratorium to protect it against CAFOs or other industries which can disturb the natural processes within the watershed.

Thank you for your consideration and interest in this process.

Pam Stewart  
PO Box 632 Jasper, Ar. 72641