

From: [Alan Nye](#)
To: [Water Draft Permit Comments](#)
Subject: Re: EC Farms Permit #3540-7
Date: Monday, April 11, 2016 6:36:57 AM

Thank you for the opportunity to submit these comments regarding EC Farms Permit #3540-7

I oppose the EC Farms application for a permit to annually apply up to 6 million gallons of swine waste to approximately 600 acres of land in the Little Buffalo watershed. Specifically, the locations for application of swine waste are adjacent to the Left Fork of Big Creek and near Shop Creek, and at locations within 3 miles of the Extraordinary Resource Water (ERW), Hurricane Creek.

Comment #1 Karst Terrain in the Area of EC Farms Will Result in the Rapid Transmission of Swine Waste Contamination into the Left Fork of Big Creek and the Little Buffalo River Watershed

It is noteworthy that dye tracing studies of groundwater flow in the karstic terrain of the main fork and Left Fork of Big Creek show rapid flow of groundwater from areas where the swine waste could be applied. The rapid flow of swine wastes that have percolated into groundwater threatens water quality in Big Creek, the Buffalo National River, the nation's first National River, and private water wells.

The main fork of Big Creek shows signs of impairment (coliform bacteria) as a result of the operations of C&H Farms. There is every reason to believe that application of swine wastes to the fields adjacent to the Left Fork of Big Creek will also result in coliform pollution of these waters.

Comment #2 Hurricane Creek, an already impaired ERW, may be further impaired by land application of swine waste in the Hurricane Creek watershed

Hurricane Creek, an ERW, is already listed as impaired due to coliform contamination. The potential spreading of swine wastes within this watershed could also further impair water quality in Hurricane Creek.

Comment #3 EC Farms proposes to apply up to 6 million gallons of waste, more than twice the current annual waste production of C&H Farms

Spreading of this quantity of swine wastes would likely overwhelm the ability of the fields to agronomically use the high levels of phosphorus in the swine waste. It has been shown from soil testing in the fields at C&H Farms that some fields already have phosphorus levels that are "above optimum". It is my concern that this will result in further phosphorus and nutrient loading to the Left Fork of Big Creek and the Buffalo National River.

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