

Claire and David Dougan
HC 62 Box 203
Ozone, AR 72854
479-292-3246
moonhullmtn@gmail.com

April 7, 2016

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317
Re: EC Farms Permit #3540-7
Water-Draft-Permit-Comment@adeq.state.ar.us

Dear Director Keogh:

I am writing today to express my continued concern about pollution flowing into the Buffalo National River due to the creation of the C&H hog operation. Recent analysis by the National Park Service of the Big Creek Research and Extension team (BCRET) data has shown that in 2014 E. coli levels exceed the state level for contamination on the section of Big Creek that is directly adjacent to the C&H hog operation and the manure spreading fields. The most recent soil tests show that the level of Phosphorous is above optimum on 16 out of 17 manure fields. It is difficult to safely get rid of 3 million gallons of untreated hog manure generated annually in a karst environment.

Now I read that C&H wants to expand its manure spreading fields to the Left Fork of Big Creek and to Shop Creek that flows into the Little Buffalo River. The Left Fork of Big Creek already has elevated E. coli levels likely from contamination from the existing C&H manure fields. Dye tracing studies initiated by Dr. Brahana demonstrated the portal for nutrients to travel from C&H hog operation to the Left Fork of Big Creek in less than one week. This interconnectivity of watersheds is very troubling given that most of the current and proposed manure fields sit atop karst terrain.

The permit request by EC Farms appears to be a sleight of hand. The original permit was for a small hog CAFO with only 300 hogs. It was closed with no ponds and no animals during 2013 and 2014 and they did not provide an annual report to ADEQ as required. A moratorium on medium and large hog CAFOs in the Buffalo River Watershed was enacted on May 6, 2014. Yet in 2015 the permit was transferred to a new individual from a co-owner of C&H to a relative. Now the relative, Ellis Campbell, wants to spread C&H manure from the largest hog CAFO in Arkansas on over 30 separate parcels in Newton County. This is illegal and should not be allowed to occur.

If EC Farms is granted this new permit, the manure from C&H will lead to further contamination of the Buffalo River Watershed. Please deny this permit and please protect the Buffalo River. Let me remind you that this is our only national river in the state of Arkansas and should have the highest degree of protection.

Sincerely,

Claire & David Dougan

cc: Katherine McWilliams

From: [McWilliams, Katherine](#)
To: [Deardoff, Amy](#)
Subject: FW: EC Farms Permit #3540-7 (Public Comment)
Date: Tuesday, April 12, 2016 8:54:54 AM
Attachments: [ADEQ letter about hog farm.docx](#)

From: Claire - David Dougan [mailto:moonhullmtn@gmail.com]
Sent: Friday, April 08, 2016 2:17 PM
To: Keogh, Becky
Cc: McWilliams, Katherine
Subject: EC Farms Permit #3540-7 (Public Comment)

Dear Director Keogh; Ms. McWilliams:

We live in Newton County, and we understand that the majority of the income for this county is directly related to tourism from the Buffalo National River. However, there are many other reasons to deny Permit #3640-7 from being allowed.

We are writing today to express my continued concern about pollution flowing into the Buffalo National River due to the creation of the C&H hog operation. Recent analysis by the National Park Service of the Big Creek Research and Extension team (BCRET) data has shown that in 2014 E. coli levels exceed the state level for contamination on the section of Big Creek that is directly adjacent to the C&H hog operation and the manure spreading fields. The most recent soil tests show that the level of Phosphorous is above optimum on 16 out of 17 manure fields. It is difficult to safely get rid of 3 million gallons of untreated hog manure generated annually in a karst environment.

We understand that C&H wants to expand its manure spreading fields to the Left Fork of Big Creek and to Shop Creek that flows into the Little Buffalo River. The Left Fork of Big Creek already has elevated E. coli levels likely from contamination from the existing C&H manure fields. Dye tracing studies initiated by Dr. Brahana demonstrated the portal for nutrients to travel from C&H hog operation to the Left Fork of Big Creek in less than one week. This interconnectivity of watersheds is very troubling given that most of the current and proposed manure fields sit atop karst terrain.

The permit request by EC Farms appears to be a sleight of hand. The original permit was for a small hog CAFO with only 300 hogs. It was closed with no ponds and no animals during 2013 and 2014 and they did not provide an annual report to ADEQ as required. A moratorium on medium and large hog CAFOs in the Buffalo River Watershed was enacted on May 6, 2014. Yet in 2015 the permit was transferred to a new individual from a co-owner of C&H to a relative. Now the relative, Ellis Campbell, wants to spread C&H manure from the largest hog CAFO in Arkansas on over 30 separate parcels in Newton County. This is illegal and should not be allowed to occur.

If EC Farms is granted this new permit, the manure from C&H will lead to further contamination of the Buffalo River Watershed. Please deny this permit and please protect the Buffalo River. Let us remind you that this is our only national river in the state of Arkansas and should have the highest degree of protection.

Sincerely,

Claire & David Dougan