

# Comments from Kent Bonar Naturalist Newton County

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What is the likely operating span of this permit? Opposed to the long term impacts, which are predictable. Waiting for impacts to be found, verified and processed is allowing them to occur meanwhile. Prevention is more effective than restoration or damage control. The burden of proof and monitoring should not be dumped on the public. The agency should not be protecting corporations from the public.

Feral hog populations in Newton County have gone up drastically in the last few years. Most likely came from permitted hog operations including present fields, and resulted from falling hog prices which would cost more to keep feeding. This illegal dumping shows ethics of permittees, and likelihood that these regulations will also be ignored as convenient.

The landslides (falling water, 7 south of Jasper, low gap, Compton) recently resulting from fracking further south show potential for other regional impacts to impact local geology and change water flow on a large scale. Minor landslides have recently occurred near Mt. Judea. Seismic testing in the <sup>Ark</sup> river valley new gas wells, and other current modifications of landscape scale further cracks rock and allows for water leaching and ice expansion to further lower groundwater. Perched aquifers are at most risks.

April 11, 2016

you need to consider other impacts on the watershed such as agricultural conversion of timber and resulting increased accelerations of surface runoff and increased leaching from loss of groundcover. Changes in surface runoff and leaching will result in changes in flow rate & sediment loads. Groundwater recharge is through leaching.

Comments should be taken after this hearing so the public can give considered responses. How can the public monitor impacts without access to application sites?

On response to my comment on the flare (comment #28) if water division doesn't have authority to regulate the methane flare, then what was it doing in the modification proposal? Is the flare operating without regulation? Timing is critical. Spring migration is about to peak.

The public health impacts of groundwater contamination should be considered, particularly antibiotics.

The County soil survey not only identifies soil types but also leaching, percolation rates, absorption rates, basic soil chemistry etc.

How is transport monitored? How effective is self-monitoring likely to be?

What if any consideration is given to changing groundwater movement? I've seen springs dry up and others appear where they weren't. Sediment plugs up some conduits; opens others.

The bat and bird risks to wildlife from the flare was <sup>page 2</sup> mentioned in my previous comments. On foggy nights, lighted towers have produced bird kills for decades on spring migration. As a teaching assistant in ornithology, I've spent all day and night skinning and injecting pickup loads of dead birds from one night's kill. (U of Missouri-Columbia) Fog diffuses light to blur everything; birds move to the light source as they become night-blind from it.

Indiana, gray, long-eared and eastern small-footed bats all fly low, just over or within the canopy; and can approach the flare without seeing it until over or close to it. Foraging bats change their nightly flight patterns in response to prey populations which constantly change.

Agricultural waste would be better applied to a more intensely agricultural area such as Crooked Creek or better the Arkansas River valley where there is no karst. This is the worst place to apply waste.