

From: [Allie Wakefield](#)
To: robert.moery@governor.arkansas.gov; [Water Draft Permit Comment](#)
Subject: C&H Hog Farm draft permit 5264-W
Date: Thursday, March 09, 2017 7:05:04 PM

This permit renewal should be denied.

C&H did not comply with guidance required under Reg. 5.402 and therefore this permit should be denied. The idea that a facility of this size and level of consumption and discharge doesn't have a plan to deal with crisis or failure is willfully ignorant and unforgivably negligent!!

This permit should be denied for many other reasons as well....

There is substantial evidence that discharge into Big Creek, and INEVITABLY the Buffalo National River, is already occurring. Data collected by the Big Creek Research and

Extension Team (BCRET) shows that nitrate levels are consistently higher downstream of this CAFO than above it. National Park Service, with concurrence of Arkansas Game and Fish Commission, has requested a 303(d) listing for Impaired status for Big Creek due to low dissolved oxygen (DO) levels, a consequence of nutrient overloading. A recent report by USGS confirmed low DO levels in Big Creek. While there may be multiple sources of impairment of Big Creek, the timing of both the increase in nitrates and decrease in DO correlates with the issuance of the initial C&H permit and logic requires that C&H be considered at the least a significant contributor. Discharge into Big Creek and its associated ERW, the Buffalo, violates regulations and therefore this permit should be denied.

The Nutrient Management Plan uses foolishly optimistic and unrealistic assumptions. It is unrealistic and ignorant to try to deny the impact of ongoing, chronically elevated phosphorus and nitrite levels on the ecosystem and watershed.

Even if the permit were to not be denied, it violates Reg 5.901(D): "A permit renewal, permit modification, or new permit issued pursuant to Reg. 5.901(C) shall not increase the number of swine permitted at a facility." Thus, it should still be denied.

This swine facility was a foolhardy, slapdash, and backroom endeavor in the first place and an insult to the public, and even national, constituency that loves and enjoys this watershed area. There is no other river like the BRC. It's as beautiful as it is historical. Do the right thing. Just say No.

Thanks,
Allie Wakefield