

From: alexylad@cox.net
To: [Water Draft Permit Comment](#)
Subject: Buffalo
Date: Tuesday, March 14, 2017 9:48:41 AM

To: Becky Keogh, Director and Katherine McWilliams, Arkansas Department of Environmental Quality, water-draft-permit-comment@adeq.state.ar.us

From: Debbie Alexy, 35 S Stonebridge Road, Fayetteville, AR 72701

Re: COMMENT re Permitting of C & H Farm CAFO Draft No-Discharge Permit #5264-W / AFIN 51-00164

Date: February 24, 2017

PLEASE EMAIL CONFIRMATION TO ME THAT YOU RECEIVED THIS EMAIL of 3 pages

I object to the original CAFO general permit issued and the current CAFO Reg 5 permit application for C&H farms due to:

1. The lack of notification provided to the public on the first permit re construction.
2. Apparent failure by ADEQ during permit process pertaining to site construction to examine, acknowledge the karst geology aspects that render this type of animal factory unsuitable in the Buffalo National River watershed.
3. ADEQ's inadequate water quality monitoring plan and methods restricted to surface water testing, selected fields for nutrient samples, and one drill hole near a waste holding pond. Methods which fail to address subsurface streams and underground water flow, as demonstrated by Dr. John Van Brahana, a renowned hydrogeologist, who recently published a peer-reviewed paper detailing results of dye tests confirming that subsurface and underground waters, in the acreages owned or leased by C & H Farm CAFO, used to spread manure discharge from the CAFO, flow directly into the Buffalo National River watersheds from MULTIPLE locations due to the karst geology.
4. Lack of ADEQ "emergency response plan" information for manure spills in the Reg 5 permit. Is there a written plan on ADEQ website? Who is liable legally and financially for a spill in the Buffalo National River watershed? C & H Farm CAFO or Arkansas taxpayers? Who has authority to call for environmental disaster cleanup? The Arkansas Governor or U.S. EPA or C & H Farm CAFO? Who has responsibility for the cleanup of manure spills for the Buffalo National River watershed? C & H Farms CAFO or Arkansas taxpayers? Who are responders to this type of environmental disaster? Who is responsible for notifying the State Health Department when manure spills or leaks occur for health risk evaluations?
5. Negative economic impact on hundreds of Arkansans who depend upon the thriving tourism industry dollars generated by the Buffalo National River.
6. Negative health impact on locals and tourists in the Buffalo National River watershed.
7. CAFO is an inhumane method for raising large animals for commercial agri-production; CAFOs increase health risks from pharmaceutical and chemical contaminants generated from the animal factory released in air, earth, and waterways of the surrounding area which affects millions of people who swim in the Buffalo National River, Arkansas children at Mt. Judea school and residents in the area who rely upon well water for drinking.

In closing, I am a native Arkansan dedicated to protecting our State's natural resources for the current and future generations by supporting good stewardship of our natural resources.

Agriculture scientists in America and Europe are challenging the policies and practices of CAFO farming methods as unhealthy for animal production, for human consumption, and environmental resources like clean air and water.

CAFO manure spills happen. The cost to the environment and States and taxpayers is tremendous.

Neighboring states have already experienced the hard realities of CAFO manure spills:

N. Carolina: Worst hog-waste spill in North Carolina's history, in June of 1995, sent 25 million gallons of soupy red hog manure gushing onto the state's roads, tobacco and soybean fields, and into the New River. A dike surrounding an eight-acre receptacle for hog waste at Oceanview Farms in Onslow County collapsed after a large rainfall, threatening fish life in the river as well as crops and area ground water.

<http://www.vivavegie.org/vvi/vva/vvstor19/hog19/fecesfiasec.html> Wisconsin: 2-mile-long manure spill reaches trout stream in Grant County STEVEN VERBURG svverb@madison.com Illinois: Pig waste flowing into rural waterways from leaks and spills destroyed more than 490,000 fish in 67 miles of rivers over a 10-year span. No other industry came close to causing that amount of damage, the Tribune found. Many operators faced only minor consequences; some multimillion-dollar confinements paid small penalties while polluting repeatedly. www.chicagotribune.com David JacksonContact

Arkansas should seize this window of opportunity to be a leader for the future, reverse course, END THIS RISKY EXPERIMENT and END CAFO PERMITTING in the "Natural State".

The Buffalo National River is a treasure of immeasurable value to all Arkansans, Americans, and citizens of our planet. Arkansans worked to be stewards for the Buffalo National River, the first river in America to earn that special designation.

The National Wild and Scenic Rivers System was created by Congress in 1968 (Public Law 90-542; 16 U.S.C. 1271 et seq.)

It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations

Please do not advance this CAFO permit for approval.

Sincerely,
Debbie Alexy

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