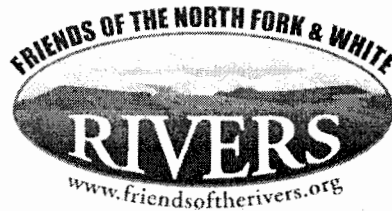


PO Box 61
Mountain Home, Arkansas 72654



Tuesday, March 07, 2017

Water-Draft-Permit-Comment@adeq.state.ar.us

Ms. Katherine McWilliams
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118-5317

RE: **Reg. 5 Draft Permit #5264W - ADEQ Draft Decision to Approve C & H Hog Farms Application for a No-Discharge Permit**

Friends of the North Fork and White Rivers (*Friends*) is a watershed protection organization focusing on the Middle Section of the White River. *Friends* is dedicated to the water quality of these rivers and the health of The Buffalo National River is a concern.

Friends asserts that the draft permit 5264W was improperly approved by ADEQ and should be denied.

We support and endorse the preliminary comments of the Buffalo River Watershed Alliance and will be submitting additional comments prior to the conclusion of the comment period on March 17.

No-Discharge Permit is inappropriate

Karst

We are mystified as to the continued avoidance to acknowledge the role of karst that not only underlies the facility but most of the spreading fields as well.

Lack of Compliance with AWMFH (Agricultural Waste Management Handbook) – Regulation 5.402 states requirements for designs and waste management plans shall be in accordance with this handbook and there are numerous examples of failure to comply.

Discharge Evidence is being ignored – this permit should be denied due to the evidence of discharge into Big Creek and the associated Buffalo River

Violates the Current Moratorium

Deficient Nutrient Management Plan.

Friends appreciates the opportunity to comment.

Sincerely,

Jane E. Darr
Board member

Friends of the North Fork and White Rivers is an Arkansas 501(c)(3) non-profit organization devoted to creating an ongoing dialogue where individuals, groups, and government agencies can work together to conserve, restore and enhance these beautiful rivers.