

From: [Karissa Sylvia](#)
To: [Water Draft Permit Comments](#)
Subject: [BULK] Hog Farm Endangers Our Buffalo River
Date: Sunday, February 26, 2017 10:11:06 AM

This seems like a really bad idea. The Buffalo is a National River and should be protected to our fullest ability. It costs much less to protect our natural resources and natural spaces than it does to try to clean them up and restore them. Clean water and areas of natural beauty should be available to all and nothing should interfere with that.

The Buffalo National River had 1.46 million visitors last year, the third-highest total since it became a national river and the highest since a record count of 1.55 million in 2009.

PRIMARY CONCERNS:

1. Notification of the public is inadequate. Notice appeared on the ADEQ website. One must know how to wade through a great deal of information to look up permit applications. ADEQ issues about 30–40 permits per month. One plus – ADEQ’s Permit Section Director told me that in the future he would try to list permits by county. That would certainly be helpful.

2. In heavy rain events, pits and ponds may overflow into Dry Creek which flows into Big Creek, a tributary of the Buffalo National River. It is approximately 6 miles from the confluence of Big Creek and Dry Creek to the Buffalo. Hog waste applied on fields can run off into streams even with the precaution of buffer zones. An aquatic biologist has explained that when “fine organics” from decomposing hog waste (includes feces and urine) run off or slowly leach into soil and water, it becomes trapped in gravel bars where decomposition continues and produces ammonia and methane – products that are toxic to mussels and fish. At risk are two mussel species and two fish being studied for classification as “endangered” near the confluence of Big Creek and the Buffalo River. It is possible that they also exist in Big Creek. Excessive nutrients in the water decrease clarity of the water, encourage growth of algae such as spirogyra, (the long green strands that we already see in the Buffalo during the summer) and lower dissolved oxygen.

3. This information is about prevention of problems. A few years down the road, the 630 acre farm may or may not be able to handle the quantity of hog waste, or the permittee may become less attentive to the rules and pollution becomes excessive as it did in NW Arkansas on the Illinois River.

4. As a conservation organization trying to protect and preserve the water quality of our streams and rivers, we have no desire for this farmer to lose

the right to develop his land. The water quality of our rivers is at stake. To his credit, this farmer operated a successful hog farm near Jasper for 10 years with no citations or permit violations.

5. We believe a long term goal of ADEQ should be to deny permits for any animal or poultry factory farms in the watersheds of major rivers and streams, especially the Buffalo River, our first National River, and a designated Extraordinary Resource Water stream. All of our designated ERW streams deserve this extra protection! The state of Arkansas is empowered to protect the quality of water in our streams and rivers by the Clean Water Act. ADEQ follows national EPA guidelines established for Hog factory farms. They can set more restrictive permit rules than EPA but must follow minimum EPA guidelines.

6. The significant economic issue is that the Buffalo National River attracts more than a million visitors each year, contributing millions of dollars to the economy of Arkansas. There must be a balance between development of industry and protecting our state waters. Do our state agencies get that? Do you, the public, value our streams enough to protect them? You must decide and let ADEQ know of your objection or concerns. The conservation community has had a good working relationship with ADEQ and their fine scientific staff. We certainly want that relationship to continue however we believe that granting the permit for the location of this new hog farm is a serious error.

Copy them to the Governor here: robert.moery@governor.arkansas.gov

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