

From: [Ross Lockhart](#)
To: [Water Draft Permit Comment](#)
Subject: C&H Farms Regulation 5 permit application
Date: Wednesday, March 08, 2017 9:12:02 AM

To ADEQ:

I am writing in support of issuance of the Regulation 5 Non-Discharge permit for C&H Farms. The owners of this facility have been operating this facility at the present location since 2012 and have been in compliance with all requirements of both ADEQ and EPA and have had multiple inspections and multiple tests and studies since they began operation. The most recent test was a drill sturdy performed in December of 2016 which found no evidence of leakage of the lagoons into the ground water. At this time there is no credible scientific evidence which can conclusively prove any wrongdoing nor any pollution that can be sourced at C&H Farms.

The opponents of this farm will site a survey that is an ongoing study of Big Creek and will state that it is conclusive evidence that pollution is being caused by C&H Farm. After taking time to review the BCRET study information to date I am aware that nitrates are consistently higher downstream, but I am also aware that higher downstream nitrates is consistent with pasture land use anywhere in the country. If you look at data on other streams within the watershed, or any watershed for that matter, with a similar land use you will see that nitrates increase downstream. I also know that nitrates fluctuate with the seasons and you can't look at the data unless you look at the seasonal variation which takes data from multiple years to establish. Additionally, the BCRET study indicates significant OD in Big Creek, but OD is influenced by so many variables it takes a significant amount of time and data to conclude how much of that OD is being generated by any one source.

Finally, any study of water quality done on the Buffalo River and it's tributaries must take into account the significant wild hog population that runs wild on the Buffalo River National Park and which uses the river and its tributaries as a water source and whose habitat is in close proximity to and sometime in the waters that make up the Buffalo River Watershed. Many estimates of Hog populations on the park put the number of hogs in excess of 1,000 head. A significantly more cost efficient and impactful use of taxpayer funds would be to find solutions to elimination of that threat before looking at a farm 5 miles from the water source that is utilizing all standard best practices and has overbuilt their facilities in such a way as to offer maximum environmental protection.

I encourage you to find in favor of issuing this permit for C&H Farm so they can operate their production facility in the consciousness and deficient manner which they have become known for since beginning production in 2012.

Thank you in advance for your time.

Ross Lockhart
President
Benton County Farm Bureau
Board of Directors.