

**From:** [Sybil Craig](#)  
**To:** [Water Draft Permit Comment](#)  
**Subject:** Comment on Permit #5264 W  
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I would like to make a few comments regarding the permitting of C&H Hog Factory located on the watershed (Big Creek) of Buffalo National River. I have long been opposed to this Confined Animal Feeding Organization (CAFO) simply by its nature. I believe in families having livestock but not to the extent that there is a huge CAFO located directly on the watershed of America's first National River.

It appears to me that both ADEQ and C&H have gone to great lengths the past few years to avoid acknowledging the delicate terrain of the hog factory's location. The area, being karst, is subject to leakage from the hog factory which in turn can flow into Big Creek and eventually into Buffalo National River. Putting a hog factory in this location was the initial mistake on the part of ADEQ as well as the owners of the CAFO and the agency that financed it. This permit fails to take into account evident that discharge into the creek and possibly the river is already occurring. The Big Creek Research and Extension Team (BCRET) shows nitrate levels are consistently higher down stream of the CAFO than above it. Seems to me that this would indicate a very likely impact that this hog factory is having on not only the creek but the river itself.

There are other studies that indicate the impact that C&H is having on the Buffalo National River. These have been published and sent to you on an ongoing basis. But, what I'd like to focus on here is the financial impact of the hog factory vs. the financial impact of those who come to the Buffalo National River.

In 2016, over 1.7 million people visited Buffalo National River. Economic figures are not in for 2016, but they are for 2015. Economic figures for 2015 show that this translated to \$62.2 million for BNR. These expenditures supported a total of 969 jobs, \$24.5 Million in labor income, \$40.2 Million in value added, and \$72 Million in economic output in local gateway economies surrounding Buffalo National River. This is based on visitation of 1,463,304 visitors in 2015. I expect the economic figures will be more impressive when the 2016 economic data comes in. When last I checked C&H has only 9 employees. So, I ask you--who brings greater economic value to Arkansas?

The wildlife in the Buffalo National River watershed depends on a healthy ecosystem, and the hundreds of thousands of tourists who visit the region each year to fish, kayak, swim and hike expect clean water. But all of that is at risk. The hogs generate more than 2.5 million gallons of urine and feces annually that has the potential to seep through the porous ground and eventually into the river. As the nation's first national river and a unit of the National Park System, the Buffalo National River belongs to all Americans and its protection now, and for future generations, is important to me. What will happen to the enjoyment (and the economy of the region) if there is hog waste in the Buffalo.

ADEQ should not grant a new permit to C&H. My preference would be to shut it down or move it.

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