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To: [Water Draft Permit Comments](#)
Cc: davidbranscum@hotmail.com
Subject: CAFO in Newton County, Arkansas
Date: Thursday, April 14, 2016 12:37:44 PM

I'm writing to oppose the renewal of the National Pollutant Discharge Elimination System (NPDES) General Permit (ARG590000) that was published on March 15, 2016 in the Arkansas Democrat-Gazette for eligible operators of Concentrated Animal Feeding Operations (CAFO) in the State of Arkansas. This General Permit (ARG590000) streamlined the permitting for a large scale swine factory CAFO that is located in a fragile ecosystem in a highly fractured soluble limestone rock (i.e. Karst) that drains via surface and groundwater directly into our Nation's first designated National River, the Buffalo National River, which has resulted in significant "on-going" public opposition. I do not want this permit to be utilized to facilitate the permitting of another CAFO in Arkansas. This General Permit (ARG590000) generated a permit that is highly controversial resulting in considerable litigation expenses and several hundred thousand dollars of tax payer money being allocated for "research" at this CAFO. Insofar as this permit by-passes well established science, it is likely its shortcomings will occur again if General Permit (ARG590000) is renewed.

Why can't ADEQ admit that they erred in granting the permit for this CAFO in the watershed of the Buffalo National River, the crown jewel of Arkansas. The close proximity of this CAFO to the Buffalo National River and placing it on karst topography shows that ADEQ did not adequately review the site prior to granting the permit. Otherwise ADEQ should never have granted the permit in the first place. ADEQ also has a poor overall system of public notification and input.

I am a firm believer in property rights, however, property owners do not have the right to jeopardize the safety of the public. The impact of this operation will extend well beyond the life of the CAFO. "ADEQ protects, enhances, and restores the environment for the well-being of all Arkansans." This is the mission statement for ADEQ. With that being said, ADEQ should never have put the safety of the Buffalo National River at risk. The Buffalo National River attracts millions of visitors every year and has become an important part of the local economy. The CAFO actually is a drain on the local economy. The road and bridge repair caused by the large trucks hauling feed from outside the county, waste matter and hog transport is yet to be calculated. This does not even consider the cost of a cleanup due to potential spillage. The tremendous water demand of the CAFO puts a tremendous strain on the local water system. Property values in the Mt Judea area are likely to suffer from the CAFO. Who wants to live next to a CAFO? The spreading of the hog waste all around the county poses a potential health hazard to all the residents and the cost in dollars could be immeasurable.

Both air and water quality would be harmed, and therefore human health threatened. We clearly should not bring this burden on ourselves.

In summary, it is not good business practice to keep compounding the problem. Close down the CAFO, compensate the CAFO owners and chalk this one up to a bad deal for everybody. It will cost us all a lot more in the future.

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