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Department of Geosciences

Via electronic delivery: Water-Draft-Permit-Comment@adeq.state.ar.us

April 14, 2016

Becky Keogh, Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

Dear Director Keogh:

This letter is written to express my **STRONG OPPOSITION** to the renewal of the Arkansas NPDES Concentrated Animal Feeding Operations (CAFO) General Permit ARG590000.

This General Permit ignores the basic science, physics, hydrogeology, and transport of feces, urine, and washwater and byproducts that are allowed to infiltrate our highly variable geologic settings in Arkansas and make their way into groundwater, wells, springs, and the surface waters of our state. Among the most egregious omissions of this General Permit is its failure to require characterization of water quality of surface or groundwater prior to permitting of CAFOs, thereby omitting, obfuscating and obscuring the impact that these industrial-scale agricultural facilities have on the hydrologic environment of Arkansas, The Natural State. The current omissions of the General Permit fly in the face of good science, and weaken meaningful questions of concerned citizens, who are taxpayers that rely on the unbiased support of your agency.

Renewal of the General Permit will be to the detriment of our environment and to the citizens of Arkansas and our guests, tourists who support our local economy. **Please do NOT RENEW General Permit ARG590000.**

Sincerely yours,

John Van Brahana, Professor Emeritus
Department of Geosciences

cc: delivered via email

Michael Lamoureux, Chief of Staff to Governor Hutchinson.

michael.lamoureux@governor.arkansas.gov

• Arkansas Pollution Control and Ecology Commissioners.

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• Jeff Crow, Deputy Director, Arkansas Game and Fish Commission.

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• Kane Webb, Director, Arkansas Department of Parks and Tourism.

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• Chris Colclasure, Director, Arkansas Natural Heritage Commission.

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• Buffalo River Watershed Alliance. buffalowatershed@gmail.com

• Buffalo River Chamber of Commerce. admin@buffaloriverchamber.com

• Scenic 14 Association. buffaloriverfloatservice@gmail.com

• Upper Buffalo River Merchants Association.

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• Arkansas Canoe Club. ozarktom@gmail.com

• Arkansas Audubon Society. jstewart@audubon.org

• Jacque Alexander, Buffalo River Chapter, Backcountry Horsemen of America. theloosecayuse@gmail.com

• Alice Andrews, The Ozark Society. alice209ok@yahoo.com

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• Sybil Craig, Buffalo River Partners. slcraig@airmail.net

• Monica Burrel, U.S. Environmental Protection Agency.

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• Miranda Hodgkiss, U.S. Environmental Protection Agency.

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• Teresa Turk, National Park Conservation Association, Buffalo National River Fellow. tturk@npca.org

• Friends of the North Fork and White Rivers.

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• Judy Dasovich, Chair, White River Group of the Sierra Club.

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• Becky Keogh, Director of ADEQ. keogh@adeq.state.ar.us

From: [John Van Brahana](#)
To: [Water Draft Permit Comments](#); michael.lamoureux@governor.arkansas.gov; [Commissioners](#); Jeff.Crow@agfc.state.ar.us; Kane.Webb@arkansas.gov; Matt.McNair@arkansas.gov; Nathaniel.Smith@Arkansas.gov; Randy.Young@arkansas.gov; chrisc@arkansasheritage.org; buffalowatershed@gmail.com; admin@buffaloriverchamber.com; buffaloriverfloatservice@gmail.com; UpperBuffaloRiver@gmail.com; ozarktom@gmail.com; jstewart@audubon.org; theloosecayuse@gmail.com; alice209ok@yahoo.com; newtoncwa@gmail.com; slcraig@airmail.net; burrel.monica@epa.gov; kaspar.paul@epa.gov; hodgkiss.miranda@epa.gov; tturk@npca.org; riverfriend@friendsoftherivers.org; [Keogh, Becky](#)
Cc: [John Van Brahana](#)
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Attachments: [opposition_to_CAFO_General_Permit.pdf](#)

Attached please find my letter communicating my strong opposition to renewing the Arkansas NPDES CAFO General Permit ARG590000.

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