

From: [Lin Wellford](#)
To: [Water Draft Permit Comments](#)
Subject: NPDES General Permit ARG590000
Date: Tuesday, April 12, 2016 3:01:23 PM

I am writing to oppose the renewal of this permit. It was wrongly permitted from the start, clearly an orchestrated attempt to by-pass the environmental protections in place, breaking ADEQ's own rules about stakeholder input and public notifications.

Still, we were assured that no harm would come to the Buffalo National River due to the land applications of millions of gallons of hog waste. Experts lined up to tell us that their studies showed that C&H would be a state of the art facility, that the spray fields would be more than adequate to safely turn the waste from 6500 hogs and piglets into harmless manure.

Now, less than 3 years later, ADEQ won't recognize data that is showing clear trends (from BCRET no less) toward impairment of tributaries. Those spray fields that were more than adequate have proven to be less efficient in up take of phosphorus than all those experts claimed, and now, through more well-orchestrated maneuvering, C&H wants to be allowed to move their spraying operation to other areas with new tributaries that feed the Buffalo River, exposing an additional 7 river miles to the same excess nutrients that fed algae last summer between Spring Creek and Rush (and probably other places- but that is where I documented long plumes of growth in the water and thick mats of algae drying along the shore in mid-September 2015).

I totally get that your agency is being leaned on by agri interests. But even in Newton County, where 20% of all employment is farming or farm service based, that means that 80% of it is not. Cargill got out because they knew that growing animals this way is not sustainable. It hurts the environment, the animals, and the economy of areas that are strip-mined of resources then abandoned. Truly, in this case, the world is watching how you protect, or fail to protect a river that belongs to every citizen.

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