



April 13th, 2016

Dear Permits Branch of the Arkansas Department of Environmental Quality:

I am writing to you on behalf of the Arkansas Audubon Society, a statewide organization committed to fostering a greater knowledge of the natural history of Arkansas and promoting conservation of our natural resources. We oppose the renewal of the National Pollutant Discharge Elimination System (NPDES) General Permit (ARG590000). Given the ecological sensitivity and importance of the Buffalo National River and its tributaries, we strongly feel that renewal of this permit will enable degradation of one of our state's most valued natural resources.

Although there is but one swine Concentrated Animal Feeding Operation (CAFO) in the Buffalo River Watershed, the disposal of waste from the large number of animals kept at this facility poses a threat to the water quality of a much greater area because of the karst topography of the region. Organisms that have come to depend on the relatively pristine waters of the watershed face potentially harmful levels of agricultural nutrients (nitrogen and phosphate), dissolved oxygen, trace metals, and bacteria such as *E. coli*, as evidenced by recent analyses of water quality measurements conducted by Dr. Van Brahana, emeritus professor and karst hydrogeologist at the University of Arkansas.

Conservation efforts are all too often *reactive*. Given that the Buffalo River Watershed is, for the most part, still intact ecologically, we have the opportunity to be *proactive* and prevent further contamination of this resource. The Buffalo River has been threatened before, but citizens, agencies, and politicians came together to protect its waters by making it a national park in 1972. We hope that unity among concerned parties will again serve to protect this state and national treasure as it faces ecological degradation from agricultural operations like CAFOs. Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script that reads "M. R. McClung".

Maureen R. McClung, Ph.D.
Conservation Chair
Arkansas Audubon Society

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From: [McClung, Maureen](#)
To: [Water Draft Permit Comments](#)
Subject: comments on NPDES General Permit ARG590000
Date: Wednesday, April 13, 2016 9:54:43 PM
Attachments: [160413-AAS-CAFO-Letter.pdf](#)

Attached please find comments on ARG590000 from the Arkansas Audubon Society.

Regards,

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