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From: Beth Barham <beth.barham5@gmail.com>
Sent: Wednesday, August 05, 2015 10:08 PM
To: Water Draft Permit Comments
Subject: Comment on C&H Modification Request : ARG590001 AFIN 51-00164

The idea of allowing concentrated animal production in the Buffalo River Watershed has not been a sound idea in the past. It is much less so in the case of the hog production facility that has been permitted, due to the escalated risk it poses.

A "band-aid" approach to controlling the potential damage from this installation with better liners, gas flares and so on should not be considered acceptable. Claims to the river's benefits on behalf of Arkansans, Americans--indeed all of humanity--are at stake. These claims far outstrip the private benefit claims of the C&H enterprise. State and federal agencies' attentions should not be distracted from their primary responsibility, which is to the greater public good.

Problems with concentrated hog production are well known and well documented in the scientific literature. While these facilities are lamentable on many counts wherever they may be placed, they are particularly negative in this case. The main reasons are:

- risk of pollution to groundwater, surrounding farm land used for spreading waste, and the open water of the river (impacting fish, other fauna, and human use).
- risk of damage to the reputation of the Buffalo River for tourism. Speaking only in terms of returns on investment, tourism revenues to the state dwarf any anticipated tax returns from the C&H facility or any similar installations which may be ushered in by complacency over the presence of this first hog business. Concentrated animal feeding facilities risk damage to the very basis of attraction enjoyed by the Buffalo River. Once damage is done to the river's cleanliness in the consumer's perception, there is little the state or federal government can do to repair it.
- it seems clear from reports that permitting of the C&H business location reflects so many irregularities that attempting to make it appear legal at this point with careful public input, etc., is missing the point. The permit was wrongly granted, or else public officials charged with oversight were seriously ineffective. Extensions or exceptions (better liners, flares, etc.) to mitigate the damage should not try to conceal that fact any further.
- history has shown that it is hard to keep government agencies and the public constantly on the watch over sites susceptible to causing serious pollution problems over the long term. With time, we can anticipate trouble because the basic idea of placing the hog farm in the Buffalo River watershed is flawed, and so eventually something will go wrong. Fingers will be pointed too late, but the fact of the damage will be there to accuse those who do not act in the present to prevent it.

It is time to move on to consideration of a permanent ban. What is needed is a concrete plan for phasing out the existing farm to relieve the state of the burden of constant surveillance. Please do what you can to assure the general public that this enormously valued natural resource will not be damaged while under state authority and with state sanction.

Thank you for your consideration of this input.

Beth Barham

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