

**From:** Nan Johnson [mailto:nan.n.johnson@gmail.com]

**Sent:** Saturday, May 17, 2014 12:40 PM

**To:** Reg-Comment

**Subject:** SUPPORT for Amending Arkansas Pollution Control and Ecology Commission Regulations 5 and 6

TO: Doug Szenher, Arkansas Department of Environmental Quality

cc: State and Federal Congressmen, Gov. Bebe

RE: Support banning new medium and large swine CAFO's in Buffalo National River Watershed

DA: May 17, 2014

I am an Arkansas resident (formerly Newton Co., now in Eureka Springs). As a retired livestock farmer from Mississippi (and also Massachusetts, where we raised a small number of heritage breed hogs each year under certified organic rule), I am familiar with hog manure, and how soils handle animal waste. The karst topography in Arkansas is the last place any responsible farmer would consider dumping huge amounts of animal waste - those adjacent fields connect surface water, groundwater, wells, springs, streams, and tributaries right into the Buffalo River.

The area is not suited for waste ponds with leakage rates of up to 5,000 gallons per day per acre of surface area allowed by current regulations or for the land application of millions of gallons of hog waste. Since Cargill does not own the waste, I can understand why they would not care what happens (the farm is responsible). But the Buffalo is a National River, and a private corporation should not be able to risk ruining our resource.

I also know the damage done by the swine facility in northeast Mississippi during the years I lived in that state. I also went to a presentation by farmers from eastern North Carolina (sponsored by Watershed Alliance) last fall and saw what years of unregulated dumpage of CAFO waste has done to damage their water and create public health crisis.

A catastrophic failure of a hog waste pond (**as has happened a number of times in North Carolina**) would create irreversible damage to the aquatic life of the Buffalo and downstream in the White River. Please note that **these problems in North Carolina have resulted in a moratorium for new swine farms and expansions of existing hog farms. Can't we learn from N. Carolina?**

As a livestock farmer, I actually did not mind the manure smell of most of my animals (goats, sheep, ducks...even chickens, though lots of ammonia there was lots of bedding to absorb it) **HOWEVER, I could not stand the smell of the manure from just the three hogs we raised each year, mostly in the woods in rotating pens) can smell. I can not imagine the smell of 6,500 hogs.** Three of the gases emitted—

ammonia, hydrogen sulfide, and nitrous oxide—are toxic and methane is a potent greenhouse gas. Entrained fecal bacteria and other pathogens can be carried by the winds from the barns, ponds, and spray fields to local residences, schools, and towns.

In a letter dated March 21, 2013 from the Arkansas Department of Health to ADEQ the statement was made that for the large hog farm in the watershed nearing completion at that time “we have concerns that water-borne pathogens—including e. coli and cryptosporidium—from the proposed land application sites may pose a risk for body contact on the Buffalo National River, a popular recreational destination.”

**Please do not insult our intelligence by calling C & H Farm a "Family farm" in the tradition of Arkansas hog farms. This is corporate operation with no concern for our "Natural" state.**

I stay in Arkansas because of the natural beauty - (not the decent wages!). I work in a tourist industry (at a resort). This is of the utmost importance to me. Thank you for your kind attention to this matter.

Sincerely,

Nan Johnson (also my husband Dave Spencer)  
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