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Comments on APC&E Docket 19-002-R & 19-003-R
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Director Becky Keogh,

Let me begin by stating that I am in approval of the proposed change to Rule 5 and Rule 6 regarding a permanent moratorium limiting size of swine Confined Animal Operations (CAFO) and Land Applications in the Buffalo National River Watershed.

White River Waterkeeper, Jessie Green will submit comments that will support my interest in the changes to the Rules.

I have been involved with many letters and communications with ADEQ, the governors office, and individuals since the permitting of C&H Hog Farms in the Buffalo River Watershed. Many of these letters were to the Department of Environmental Quality staff so I have many notes and documents not found on the website anymore that show the department did not take Accountability serious.

The Rules are not stringent enough, they are a vague piece of paper that are designed to allow a slight oversight of a permit. Otherwise why not require yearly soil samples and inspections to insure water quality standards are being met and the permit nutrient management practices are properly designed for the conditions of the management of the cafo? Then when finding these don't meet the water standards revise the permit immediately (not 5 years from now as you have stated for compliance).

An example of a permit and its entire operations are reflected in the C&H Hog Farm Permit. C&H Hog Farms began spreading waste in Dec after only being in operation a few months. One possible reason could be the sows were larger than the sows managed at EC Farms and they had more waste than anticipated. (See Dr Sharpely's deposition in recent hearings about the need to spread in winter due to large amounts of waste). This first application of waste was done during freezing temperatures when there was no growth or agricultural need for crops. This could not have been done to provide protection to the waters of the state, nor did anyone show accountability for the algae blooms and degradation to the Buffalo River after the permitting of C&H Hog Farms.

If ADEQ had shown accountability to the citizens and waters of the state when proof of degradation by the impairment of Big Creek and the Buffalo National River in 2018 was shown the office of ADEQ would have required C&H Hog Farms to find alternative actions for their waste. The lack of enforcement on permit holders have allowed deterioration of our National River to the point that it is now a polluted waterway. This lack of action happens all over the state.

The Buffalo National River has the highest water protections in the nation but you, ADEQ let her degrade, you allowed industry to steal her away and you have left your citizens a stench that will take years to dissipate. This rule change should only be the first step in securing that the citizens of Arkansas will never have to fight you again for her protection.

My experience with your agency has been with the Buffalo National River but as I drive around the state and see other waters I realize you have created a very discouraging future for the Natural State's waters. There appears very little oversight, very little education and a large amount of pollution on an ongoing rate that is destroying the heart and health of many living in Arkansas.

Part of loving something is a desire to nurture it.
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