

**From:** [donrmccaskill@gmail.com](mailto:donrmccaskill@gmail.com)  
**To:** [Reg-Comment](#)  
**Subject:** Proposed Rule Changes to Rules 5 & 6 / Buffalo National River Watershed  
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The Buffalo National River is a crown jewel in **“The Natural State”** and deserves to be protected to eternity for future generations to enjoy. I grew up in Arkansas and lived in the beautiful state most of my life. I first started canoeing on the Buffalo in the 1970’s, and it has always been something special to treasure and protect. I appreciate the DEQ’s effort to continue that mission, but in my opinion, the proposed rule changes do not go far enough. In order to adequately protect this fragile environmental masterpiece created within a zone of karst geology, I believe the following points must be considered:

1. Future regulations must be in the form of permanent prohibitions instead of moratoriums that are inherently subject to renewal and potential weakening;
2. The prohibition must not be limited just to swine CAFOs, but must also include concentrated “factory” farming of cattle and other domesticated livestock that, for purposes of efficient operations, generate liquid waste with associated handling facilities;
3. No exceptions should be made that would allow permitting small CAFO’s (based on number or size of animals) in the watershed since multiple small operations would likely be equally-damaging and even more difficult to monitor and control;
4. While concentrated poultry production does not typically produce liquid manure, scientifically-based restrictions on generation and/or distribution of poultry litter in the watershed should also be administered; and,
5. Technologically-sound restrictions on the importation of animal manure from outside the watershed and its application as fertilizer should be considered.

For the record, I grew up on a small farm and truly appreciate the importance of animal agriculture in the state. I also recognize that farming operations around the Buffalo have always involved the production and utilization of livestock, and I am not proposing that this should change. While the karst geology of the Buffalo watershed was able to tolerate historic animal production levels, confined and concentrated animal production facilities bring on completely new challenges to the ecosystem. CAFO operations and associated manure handling facilities should only be permitted in regions with non-karst geology to prevent contamination of groundwater and inadvertent direct flow of contaminated surface water into streams.

Thank you for your consideration of my thoughts and input.

Sincerely,

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