



Sept. 23, 2019

Ms. Becky Keogh
Division of Environmental Quality Headquarters
5301 Northshore Drive
North Little Rock, AR, 72118.

Dear Ms. Keogh,

National Parks Conservation Association (NPCA) respectfully submits these written comments in response to Arkansas Department of Environmental Quality's (ADEQ) petition to initiate Rulemaking on Regulation No.5 related to Liquid Animal Waste, and Regulation No. 6 related to the National Pollution Discharge Elimination System (NPDES) program. National Parks Conservation Association supports the changes proposed by ADEQ to Reg. 5 and Reg. 6 that would institute a permanent moratorium on issuance of permits for medium and large Confined Animal Feeding Operations (CAFOs) in the Buffalo National River watershed.

National Parks Conservation Association appreciates the leadership of Governor Hutchinson and this Division in taking the necessary steps to protect one of our nation's most significant natural wonders. We urge the Arkansas Pollution Control and Ecology Commission to adopt the proposed modifications to Rule 5 and 6, permanently prohibiting the development of swine medium-and-large CAFOs in the Buffalo River watershed.

The Buffalo National River's significance is not based on a single quality, but the combination of natural, scenic, cultural, and scientific features that are protected for the benefit and enjoyment of present and future generations. The karst geology, including over 360 caves, thousands of sink holes, sinking streams, springs and natural features related to karst processes highlight the national river's sensitivity to pollutants. The National River designation protects natural rivers from industrial uses, impoundments, and other obstructions that may change the natural character of the river or disrupt the natural habitat for the flora and fauna that live in or near the river. The karst geology of the Buffalo National River makes it highly vulnerable to pollutants from CAFO operation run off.

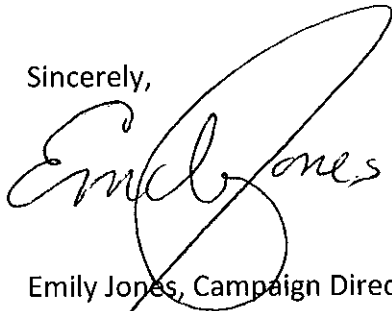


NPCA supports action to amend Regulation No. 5 to make permanent the moratorium on confined animal feeding operations of a certain size in the Buffalo National River Watershed in accordance with the Governor's request to protect the historical, cultural, and recreational significance of the Buffalo National River as the nation's first national river. This action is necessary to protect the water quality of the Buffalo National River and its watershed tributaries and general protection of human health and the environment.

NPCA supports action to amend Reg. 6 to make permanent the moratorium on confined animal operations of a certain size in the Buffalo National River Watershed. NPCA agrees that the rule is necessary to protect the water quality of the Buffalo National River and the recreational and tourism economy associated with the River

Thank you for the opportunity to submit these comments, and the work of your Division and Governor Hutchinson to protect the Buffalo National River for future generations.

Sincerely,

A handwritten signature in black ink that reads "Emily Jones". The signature is written in a cursive style with a large, looping flourish at the end.

Emily Jones, Campaign Director, Southeast Region
National Parks Conservation Association
708 Walnut Street, Suite 200
Knoxville, TN 37902