



September 21, 2019

Arkansas Pollution Control and Ecology Commission
Transmitted Via Email

RE: Statement of support for a permanent swine CAFO moratorium in the Buffalo River Watershed

Friends of the North Fork and White Rivers support the changes proposed by ADEQ to Rule 5 and Rule 6 that would create a permanent moratorium on the issuance of permits for medium and large swine confined animal feeding operations (CAFOs) in the Buffalo river watershed (BRW). It is widely accepted that most of the BRW is underlain by karst geology. The thin top soils that overlay this karst formation are generally unable to efficiently assimilate animal waste, allowing rapid infiltration of waste products into the karst hydrogeology.

It is well established that karst groundwater is extremely vulnerable to contamination. Studies by state hydrologists prove that the groundwater in the BRW has a rapid flow rate through channels and conduits to perennial streams and that groundwater is the source for base water flow of the Buffalo River in the low flow months.

For swine CAFOs under Rule 5, design and operational considerations and requirements for agricultural waste management systems are to be planned according to the USDA Field Office Technical Guide and the USDA Agricultural Waste management Field Handbook. Based on defined risks of these technical publications, the ADEQ determined that the risk to the public health and the environment of the BRW is “very high” when considering the

geological setting of the C&H Hog Farm, the proximity to the outstanding resource waters and the size of the operation.

The Big Creek geologic location for this hog farm is representative of the sub-watersheds of the BRW. It was also stated by the ADEQ, in its Statement of Basis for Denial of a Rule 5 Permit that “the operation of this facility may be contributing to the impairment of the waters of the state”. So, not only is the BRW considered higher risk for swine CAFOs as defined under Rule 5, but a valid example exists that a medium swine CAFO in the BRW permitted under Rule 6 contributed to the impairment of the waters of the BRW.

We commend Governor Hutchison and the Commission in its efforts to protect this nations’ first National River and this state’s most important tourist attraction. We urge you to adopt the proposed moratorium for medium and large swine CAFOs in the Buffalo River watershed.

Sincerely,

Sam Cooke

Immediate Past President

Friends of the North Fork and White Rivers