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From: [Lin Wellford](#)
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To: [CPP-antideg-comments](#)
Subject: Comments on Antidegradation Implementation Methodology
Importance: Normal

Thank you for this opportunity to comment on this extremely important issue.

Humans generally are not aware of the impacts of slow but steady pollution. Without a sudden die off or extreme change in the smell or look of a waterway, we tend not to notice subtle changes.

But over time, changes become obvious. Mussels once common vanish. Birds that require clean water to support caddo flies and other preferred food sources, disappear. A swimming hole that for generations was crystal clear slowly turns cloudy and fills with algae. Rarely do these things happen overnight. Gradual changes are easy to overlook or blame on unusual weather patterns.

As we saw with the Buffalo River, and with other waterways in NW Arkansas, the use of manure and poultry waste as fertilizer, when applied in amounts far surpassing agronomic need, eventually becomes impossible to ignore. By then untold damage has been done, some of which may prove difficult to undo. Anyone traveling towards Yellville will see the massive feed mill that now towers like a city skyscraper over the rural landscape, flanked by a new rail system designed to import corn and soybeans from elsewhere into the area. Clearly there is anticipation that many more giant poultry houses will be built and need the feed that mill will supply. Importing nutrients into a karst area so near to Crooked Creek, a tributary to the White River, along with the additional tons of waste that will be produced and used as fertilizer, practically guarantees that we will see the steady degradation of that creek and the river it feeds. We already know that the Ozarks, with scant top spoil and few row crops, has a limited capacity to take up nutrients. Without baseline data before this plant begins full operation and all the new poultry houses are in production, there will be no way to gauge the impacts until the creek starts dying.

That's why a codified antidegradation implementation methodology is so vital. As with so many things, prevention is much more economical than any restoration effort could be. We simply can't continue to make mistakes and gamble with our shared resources, betting that nature will heal itself once the pollution stops.

We can and should do better. The corporations who flourish under our current system of agriculture take no responsibility for the damage done, and don't contribute to clean up efforts. As a government entity, you are tasked with protecting the environment from abuse. It's time to do your duty.

Thank you for your attention.

Lin Wellford
Ozark River Stewards
Kings River Watershed Partnership Board
White River Waterkeeper, Inc., Board