

Maureen McClung

Greetings

Attached please find comments from the Arkansas Audubon Society regarding the C&H Hog Farm Draft Regulation.

Regards,

Maureen McClung

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Dear Permits Branch of the Arkansas Department of Environmental Quality:

I am writing to you on behalf of the Arkansas Audubon Society, a statewide organization committed to fostering a greater knowledge of the natural history of Arkansas and promoting conservation of our natural resources. **We strongly support the draft denial of C&H Hog Farm's application for Arkansas Pollution Control and Ecology Commission Regulation 5 Permit 5264-W, AFIN 51-00164.** As feared, mounting evidence links the farm to degradation of the Buffalo River watershed. This permit denial is a positive step towards addressing this threat.

ADEQ's statement of basis for the draft denial highlights several alarming pieces of evidence that demonstrate the threat of the C&H Hog Farm. First, though C&H Hog Farm has claimed the site contains no karst terrain, studies suggest otherwise. A karst landscape means that waste from the farm has the capacity to spread further and faster, particularly during high water events. Operation of such a facility on this landscape would require significantly more environmental assessment and protections take place than currently exist. Second, data from the area suggest unacceptable levels of nutrients such as nitrogen and phosphorous in surrounding waterways and soils, respectively. Sections of Big Creek and the Buffalo River in this region have recently been proposed as impaired by ADEQ based on measures of pathogens and dissolved oxygen, levels of which can be affected by said nutrients. Thus, the evidence strongly suggests that declines in environmental quality are linked to the hog farm operation.

In a 2016 comment period, we encouraged ADEQ to think proactively instead of reactively regarding the conservation of the Buffalo River Watershed. The denial of C&H Hog Farm's permit demonstrates an effort to act before it is too late, and we applaud this move. We hope the decision will remain as written in order to protect this natural resource that is so important to citizens of Arkansas and the United States. Thank you for considering our comments.

Sincerely,

A handwritten signature in cursive script that reads "M. R. McClung".

Maureen R. McClung, Ph.D.
Conservation Chair
Arkansas Audubon Society

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