

Bob Allen

I am Bob Allen, Conservation Chair for the Arkansas Canoe Club and I live in Dover Arkansas. The Canoe Club has over 700 family memberships in several chapters here in Arkansas and additional chapters in several surrounding states.

There are two over-arching features to our support of the Denial of the Regulation 5 permit for C&H Hog Farm.

First, C&H did not supply the geotechnical evidence to support their application. Evidence for the inappropriate location of the farm follow from topographic and hydrographic data revealed via testing after the fact. Dye tracing studies, Electrical Resistivity testing, and a single bore-hole near the holding ponds all indicate porous karst underlying the farm. This allows the rapid movement of hog feces and urine from pond leakage and the spray fields to Buffalo National River.

Second and equally important are the numerous violations from both their own Nutrient Management Plan and the guidelines of the the United States Department of Agriculture Agricultural Waste Management Handbook.

In addition to our recommendation to deny the Regulation 5 permit we also believe that to protect the Buffalo National River from future degradation, the temporary moratorium for medium and large CAFOs be made permanent.

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Bob Allen, Emeritus Professor of Chemistry

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Bob of the Ozarks:

<http://ozarker.org>

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Science is what we have learned about how to keep

from fooling ourselves — Richard Feynman

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