

Dear ADEQ,

Although I've worked closely with ADEQ over the years as a biologist with another Arkansas state agency, I'll identify my work experience over the years and plainly state that I write this simply as an Arkansas resident for most of my 63 years of age. I am a retired fisheries/aquatic biologist having received a degree in fisheries biology from Colorado State University and working as a professional fisheries/aquatic biologist for nearly 40 years, 36 of those with our state Game and Fish agency (which I do not claim to represent via this letter after retirement 2 years ago by any means). For the majority of those 3 decades plus, I worked on rivers and streams throughout Arkansas, evaluating not only the impacts of anglers on fish populations but almost as much on other natural and man-induced impacts to our invaluable stream resources. Certainly this included floods and droughts as natural impacts but also gravel mining, natural gas fracking, silviculture and other man-induced impacts. I've worked with numerous ADEQ ecologists, biologists, inspectors, chemists and administrators over the years on such matters mentioned above and found the ADEQ staff to be in general a solid group of professionals.

That is why it pains me as I have followed the C and H Hog Farm issue over the years via the press, TV, web and in person at Commission meetings how the ADEQ agency can continue to NOT work as they once did when say, Randall Mathis, was Director. In a situation such as the consideration of allowing a hog farm with its significant amount of liquid waste flowing into a major tributary of the Nation's First National River, then Director Mathis would have immediately notified all the state agencies that had anything to do with natural resource management in the state (i.e. Game and Fish, Soil and Water Commission [now ASWCC], Health Department, Forestry Commission and so on) about this potential permit since these agencies are supposed to be working together for the management of the state's most valuable resources like a team. AND to be frank, he would also have contacted the key people in various citizens groups so they wouldn't be blindsided by such a permit approval since the public should be part of the team as well.

Instead, relative to the history of this issue, (1) while the ADEQ might have done what they had to do originally according to the letter of the Law, they did not follow in the spirit of a team player with the best interests of Arkansas' natural resources in mind. On something this large, a state agency needs to practice some public outreach in order to get representative public comments. A rush job does not benefit the state as a whole. (2) When monitoring was conducted on site on Big Creek and other parts of the Buffalo River watershed which is in a karst topographical part of the state, well respected geohydrologist Dr. John Van Brahana (USGS, UAF geoscience professor emeritus) and his team's data was not utilized by the Big Creek Research and Extension Team, based out of the UAF's Department of Agriculture. The BCRET found supposedly no real problems with water quality nor flow transport from the hog farm into or around Big Creek, a major tributary of the Buffalo, while Dr. Van Brahana's data showed dye injections coming up in five locations in the mainstem Buffalo River. And Dr. Van Brahana's results were verified by two external scientists who ran duplicate samples from their dye receptors. (3) Potential leakage from C and H's hog farm's waste lagoons was initially identified by Dr. Todd Halihan, hydrogeophysics professor from Oklahoma State University via electrical resistivity imaging. So, ADEQ hires Dr. Halihan to do follow up bore hole drilling to evaluate this potential leakage. That was a good decision. Unfortunately, rather than do multiple bore holes to get some idea of the scope and variance of this leakage, only one hole was drilled. So n=1 finds little to no significant leakage via the one hole that was drilled. What field in science, whether it's chemistry, fisheries, geology or whatever only takes one sample and calls it adequate?

Therefore, at this point in time, considering the lack of good or even adequate science, public outreach, and/or monitoring, and the impact of such a facility on the ecology of the Buffalo River, which in turn has the potential to impact a strong economic driver in that part of the state, I strongly suggest ADEQ not approve the new and revised permit until additional outreach and science can be conducted. I appreciate the opportunity to make these public comments to the agency mandated to uphold water quality in the Natural State.

Sincerely,

Steve Filipek  
Bismarck, AR  
501-545-8331