Comments on draft Environmental Assessment of the C & H Hog Farms, Arkansas
I submitted a short public comment that referred to the distances of the C & H Hog Farms to the community and local residence. I do not cover that comment in this section.

First thing I looked for was the preparers of this draft EA. It says first page USDA and SBA, August 2015
I went to the back page to find Ecosphere Environmental Services, Inc. personal listed page 5-1 under consultation, coordinators, preparers.
I have read thru this document and observed much is redundant so I am not going to elaborate on every mistake or issue I see as a significant impact of a large swine facility located in karst terrain and the Buffalo National River’s watershed.
There is an elaborate history of the Buffalo National River and Congress’s decision to preserve this area for the American people and the visitors of the world. It was what the people of this country wanted and thankfully Congress listened.
I have recreated this area of Arkansas since a child and now as a resident of Newton County spend much of my personal time volunteering to keep it a national treasure for all to utilize.
I was disappointed to read this environmental assessment. I continue to believe our government agencies are looking out for the people of this country and hire people who take our interest and our health into consideration, as loving parents to the children.
Something that I continue to learn as I become more politically involved is that special interest groups continue to lobby our lawmakers for their own profits and all the facts are rarely revealed. The workers of this country are working and have little time to follow up with more than the elections. The money is continually squeezed out of their pockets while the wealth of this country is more and more isolated in the upper class. The FSA & SBA recently settled fees in the amount of $250,000 from a lawsuit filed in which this EA was ordered to be done again. The tax payers are continuing to foot the bill of this permitted large confined animal operation in the Buffalo River watershed and that amount is not addressed in this environmental assessment as a SIGNIFICANT IMPACT. Every citizen of the state of Arkansas is affected by the environmental assessment that Judge Marshall declared flawed and cursory. The impact of this has not been addressed.
The loan, C & H Hog Farms, of 3.2 million dollars was backed by the Small Business Association, a government loan. Where were the Farm Service Association and SBA loans assessed in this document? Had these loans not been approved, the C & H Hog Farms would not have come into existence. Therefore, I believe these should be included as part of this document. Without C & H Hog Farms in the Buffalo National River watershed there would not be the expense of all the agencies including Arkansas tax payers who will spend over $750,000 alone to the Big Creek Research Extension Team (BCRET), at the University of Arkansas as the university works with C & H Hog Farms to lessen their impacts to the Buffalo National River, Big Creek and the residents that live so closely to this CAFO. The expenses of the Buffalo National River and their increased laboratory and employee time is not addressed. There are many private individuals giving of their time and monies to record the potential impacts of this CAFO in the Buffalo River watershed this is not addressed in this EA either, yet it is a
significant impact. Arkansas did swine testing in the Buffalo River watershed and were able to work with the swine cafo’s to lessen the impacts. Those that didn’t want to comply got out of the business. This study and the many other documented studies on CAFO’s and water quality degradation were determining factors in the governor using tax payers of Arkansas to provide the University of Arkansas with funding to monitor C & H Hog Farms.

Section 1.1.3
The site is not generally flat, elevations range from 820’-960’ elevation, see topo map Mt Judea Quad, Arkansas. The barn is located on the only available flat area of the 23 acres.

Section states the C & C Hog Farm facility was closed. This facility was closed but the permit remained open and has a new owner and name changed to EC Farms, owner Ellis Campbell. See ADEQ Database, Facility and Permit Summary, EC Farms. EC Farms has applied to ADEQ to spread C & H Hog Waste on the lands once leased to C & C Hog Farms once owned by Richard and Phillip Campbell. This proposed action is not mentioned in this draft EA but it is in ADEQ’s data base with a letter from Ellis Campbell stating his intentions.

The proposed major modification request to install 60 millimeter high density polyethylene liners is inaccurate as it must mean 60 mil. Same for 80 millimeter must mean 80 mil. I couldn’t find any 60 millimeter liners on the internet.

1.2 Page 1-5
Assuming pre conditions couldn’t be analyzed is incorrect. Every farmer knows his land and the history associated with it. Farmers utilize government agencies and file taxes yearly of expenditures and profits.

C & H Hog Farms did not exist and was not built on the CAFO owners farm land. The land was purchased with the loan from the SBA & FSA. See original documents NOI, NMP. Prior land use is easily analyzed and the addition of up to 6,503 hogs on 23 acres appears to be a significant impact. Power failures are common throughout the winter and ice storms have been known to leave areas powerless for 3 weeks or more in this county.

The waste application fields, see NMP, were leased farm land, 17 fields 8 different owners, excluding the approximate 53 acres Jason Henson owns in Field 1, 2, & 4. Management of these fields is included in the NMP and the owners names are listed, surely the owner of C & H Hog Farms can supply prior information.

Field 5 and Field 6 have not had any hog waste applied, either field could be tested for pre conditions. See C & H Summary. Field 4 is an active limestone quarry owned by Jason Henson, easy enough to receive pre condition reports.

2.1.1 Page 2-1
Ariel photographs made in July show no fencing or signage around lagoons.

2.1.1 Page 2-2
Adding application fields is a major modification. See NPDES Regulations.

Page 2-6
There is mention of “prior to C & H Hog Farms” It is possible to remove C & H Hog Farms and restore the area. This action was not addressed. Had SBA and FSA done a proper EA to begin with the C & H Hog Farm factory would not be located in the Mt Judea area. See Judge Marshall’s rule in requiring SBA and FSA to take a hard look. The environmental assessment must include the scientific data that has been collected ongoing through September 2015. The National Park Service has been recording data and has it listed on the web site. They do weekly water quality sampling on Big Creek. You have chosen to only include data from the NPS site to the date of 2013. Why? The NPS website has data to the year 2015.
Dr. Brahana’s Dye study was not consulted. It shows dye leaving the area of the spreading fields and arriving in springs in the Buffalo National River. Isn’t this important in an environmental assessment? It is public information, yet you have not included the study. Isn’t this important to our first national river, a river you and I own.

There was no mention of the amount of truck traffic that hog CAFO's bring into a county or community. There is no mention of the economic dollar amount a community will spend to repair the highways from heavy truck traffic or to keep the roads passable. Newton County has steep winding highway and county roads. Highway 7 is used by semi trucks and the accidents are frequent. The tractor trailer rigs are often overturned and the National Park Service and other agencies are called to protect the Buffalo National River and its tributaries from accident spills. I saw no mention of this in the EA. The cost of clean up of untreated waste as a “honey wagon” loaded with thousands of gallons of swine poop flowing into the Buffalo National River is a SIGNIFICANT IMPACT to us all. It is possible that it quickly disappears into a conduit and as you state is diluted and therefore not significant impact, but I disagree as the other 2,068 people did that commented to approve a rule change in Arkansas regulations to support a moratorium against medium and large swine facilities in the Buffalo River Watershed.

The Institute of Science, Technology and Public Policy states in a publication of CAFO’s, Concentrated Animal Feeding Operations
Prior to their construction, cAFos are often promoted locally through claims that they will bring economic vitality to the area. However, the research conducted after operations begin indicates otherwise. The evidence shows a loss of jobs, depressed property values, loss of income for local businesses, and a huge drain on county resources resulting from cAFos coming into a rural area. A significant cost to counties lies in the road and bridge upgrades and repairs
necessitated by hog and manure transport traffic.

3.1 Page 3-1

Had the original EA not been so poorly done a US Judge wouldn’t have called for a new EA. It is all important.

Floodplains. Fields along the creek flood, that’s a given. Everyone who lives along Big Creek will tell you…rain comes down, travels quickly across or through the ground, creeks rise and flood, then water is gone. Its as quick as that. Water gets over the bridges, roads and fields flood and recede all within a matter of minutes.

Page 3-11, Piezometers were installed in the three monitored fields by the BCRET team. These were flooded in the spring and currently the private landowner has denied access.

The landowners are public knowledge. Which landowner or field denied access, or is this hearsay? There are 3 different landowners, one for each of the fields. I am tired of all this misinformation, this draft EA is full of as many errors as the nutrient management plan for C & H Hog Farms and the BCRET reports.

Noise. Did you go to the Mt Judea school and ask about the noise. Children have keen hearing and the school is ½ mile across the valley. It is on the same elevation as the CAFO. Trucks pass the school and playground continually carrying hogs, feed, fuel, etc to or from the CAFO. There is one article of the loading of the hog truck during “decoration day” at the community cemetery ½ mile to the south of the CAFO. The article related that the smell of hogs was overwhelming and the sounds of squealing upset participants of the annual event.

Air Quality. I see no mention of the fans that expel the noxious odors from the barns. These fans, though I couldn’t find in the Notice of Intent, appear to be 5 ‘ industrial strength, approximately 64 fans. Not only is C & H Hog Farms built on karst it is also built below the inversion layer of the valley. The school and community are below or at the same level as C & H Hog Facility. That means that each time these fans come on the air from inside those barns is circulating around the valley floor, and it will not be released
until the sun releases it. The fans run and forces the particulates and gasses into the community. Living here I know that it can be 9:00-10:00 am before I see the actual sun due to this natural way. There are days there are no inversions, there are days when the clouds don’t lift. The air from the cafe travels downward into the Buffalo River Valley and upward of the Big Creek valleys. It is well noted by the residents of Big Creek and here along other tributaries to the Buffalo River.

Again, you must consider the “prior” to C & H Hog CAFO, what if there were no CAFO? Would the children at the Mt Judea school and the elderly, or the community be exposed to the dust, odors, and gasses associated with up to 6500 hogs in a confined space. The fans are enormous and come on at specific times of day to remove the noxious gases from the barns. One local resident when told of the EPA’s Inspection and report stating there was no smell couldn’t believe it. The resident angered and said to me, “That’s a lie, who did you say did that report, they don’t know what they are talking about, I smell it everyday, I can no longer have outdoor barbecues, kids at school are having headaches….THEY ARE LYING”. Now, interview local residents and ask them if this CAFO has interfered or made any significant changes to their lives due to odors-air quality. One night while sitting on the bluff near our home enjoying the river with about 20 friends, most biologist or geologist, all conversations stopped, one person said, “what is that smell”, when you live on a river you wake up to fog nearly everyday, this saddens me as it has changed due to C & H Hog Farms. Inversions trap the air in the valley’s. C & H is below the inversion layer, all that odor and dust is trapped until the sun shines bright enough to lift the cloud.

National Resources Defense Council [http://www.nrdc.org/water/pollution/nspills.asp](http://www.nrdc.org/water/pollution/nspills.asp) **Threats to Human Health from CAFO’s.** People who live near or work at factory farms breathe in hundreds of gases, which are formed as manure decomposes. The stench can be unbearable, but worse still, the gases contain many harmful chemicals. For instance, one gas released by the lagoons, hydrogen sulfide, is dangerous even at low levels. Its effects -- which are irreversible -- range from sore throat to seizures, comas and even death. Other health effects associated with the gases from factory farms include headaches, shortness of breath, wheezing, excessive coughing and diarrhea.

Animal waste also contaminates drinking water supplies. For example, nitrates often seep from lagoons and spray fields into groundwater. Drinking water contaminated with
nitrates can increase the risk of blue baby syndrome, which can cause deaths in infants. High levels of nitrates in drinking water near hog factories have also been linked to spontaneous abortions. Several disease outbreaks related to drinking water have been traced to bacteria and viruses from waste.

On top of this, the widespread use of antibiotics also poses dangers. Large-scale animal factories often give animals antibiotics to promote growth, or to compensate for illness resulting from crowded conditions. These antibiotics are entering the environment and the food chain, contributing to the rise of antibiotic-resistant bacteria and making it harder to treat human diseases.

University of Iowa scientists released a study in June 2006 showing that children who attend school near CAFOs may be at higher risk for asthma. Students at the study school, located 1/2 mile from a CACAFO in northeast Iowa, showed a prevalence of physician-diagnosed asthma in 19.7% of cases; only 7.3% exhibited asthma from the control school more than 10 miles from a CAFO. There are so many studies on the internet you cannot deny the impact to human’s is not significant and if C & H didn’t exist in Mt Judea the people would have potential for healthier lives.

In an Iowa University Study on CAFO’s and air quality the following conclusion is reached concerning health affects of CAFO’s on surrounding communities. http://www.public-health.uiowa.edu/ehsrc/CAFOstudy/CAFO_6-3.pdf. Conclusion Numerous occupational studies have documented significant increases in respiratory disease and other respiratory adverse health effects, including CAFO-related deaths, acute and chronic respiratory diseases and associated symptoms and acute losses in exposure-related lung function and progressive respiratory impairment, among those who work in CAFOs. However, it is recognized that the CAFO workforce is generally healthy, while those in the general community, including children, the elderly, those with chronic impairments such as pre-existing asthma or chronic obstructive pulmonary disease, are expected to be much more susceptible to CAFO exposures. There is experimental and epidemiological evidence that very low levels of exposures to ammonia, hydrogen sulfide, known to be ambient air toxic gases arising from CAFOs, may result in adverse health effects among healthy volunteers and community residents. While limited in number and scope, the currently published, peer reviewed, community-based studies of adverse health affects associated with CAFO exposures find an increased prevalence of similar symptom patterns, especially respiratory symptoms, and similar indicators of reduced quality of life. Taken together with other experimental and epidemiological observations of adverse health effects observed with low levels of exposures to chemical components (ammonia, hydrogen sulfide) of CAFO emissions, these findings support a conclusion that CAFO air emissions constitute a public health hazard, deserving of public
health precautions as well as larger, well controlled, population-based studies to more fully ascertain adverse health outcomes and their impact on community health services.

Page 3-2 The draft EA mentions a proposed major modification to C & H Hog Farm that would reduce air emissions from operations by capturing combusting methane in a flare. This would effectively convert methane emissions to combustion emissions such as water and carbon dioxide, thus reducing greenhouse gas emissions from the CAFO operations. What are the emissions from the flare? You must have all the elements inside the barn to analyze the emissions. Remember C & H Hog Farm is below the inversion therefore trapping the air until that inversion is lifted.

The need for a major modification suggests to me that air pollution is occurring and that the CAFO owners and Cargill are aware of the need to make modification because they are polluting the community and the environmental in reference to the above studies and documentations.

3.2 page 3-3. There is a USGS site for Mt. Judea. http://nwis.waterdata.usgs.gov Check this site for steadily increasing nitrate levels in the Big Creek below C & H Hog Farms such as on 8/25/2015 the site shows 0.608 P. Big Creek below the CAFO shows significant algae growth.

3.2.1 page 3-6
CAFO spray field 6 is only 3.8 air-miles to an endangered Gray Bat maternity colony. The boundary of the National Park is 2.8 air miles from the nearest spreading fields. Only by following the roads will you get 5.6 miles. The county roads are routed around steep bluffs, karst, streams and rivers.
Buffalo National River has water quality data reporting on their website through 2015, this includes weekly sampling of Big Creek. BUFFT06 monitoring site. There is sufficient data on the BNR site to show prior data to C & H Hog Farms and the addition of C & H Hog Farm into the watershed shows degradation of the quality of the water within the Buffalo National River at the site then the two sites at Carver where Big Creek flows directly into the river. It appears you have picked the data you want to show so that C & H has no impact on water quality. How can 4 million plus gallons of untreated hog waste have no impact?

BCRET, like this draft EA appears to pick the data that either doesn’t support C & H Hog Farm as a contributor to degradation or doesn’t mention it. Such is visible at one of the BCRET monitoring sites on Big Creek where the equipment has been non functioning since Jan, 2015. This site is the at the southern end of the valley and south of the nearest
spray fields. It was included in a flood, but that was after the water intake was removed from the creek.

Left Fork Big Creek has many springs and caves. Some of these springs report positive to Dr. Brahana’s Dye study. Suggesting Left Fork of Big Creek contains no CAFO nutrient and bacteria is an non-factual statement.

Page 3-8
Vandalism did not occur and the landowners were never consulted by the BCERT team to access their property. Had the site been fully constructed it would have been washed in the flood that hit Big Creek during the heavy rains in June and July. The BCERT team claims this vandalism, but the landowner has a letter showing his property was what was vandalized. He had no idea who or what was being constructed on his property. His house is passed every time BCERT takes samples. This has caused the owner considerable stress and harm as BCRET has continued to make this comment that they received vandalism at this site.

Page 3-10
Newton County Arkansas has more known caves than any other county in the state of ARKANSAS, Chuck Bitting, NPS Cave Specialist.

Page 3-11
Field 1 was flooded? Big Creek must have flooded the whole valley! That means the whole town of Mt Judea flooded including the school! I didn’t hear this. Jason Henson, owner of C & H Hog Farms and owner of Field 1 has denied access! Wow! Imagine that limestone quarry in field 4 under flood at 1,000’ elevation. See Dr. Hallihan’s Resistivity Testing, BCERT.
If I had a study that had cost the state of Arkansas an amount of $45,000 for peizometers I’d do everything I could to gain access to those pieces of equipment.

You state that it is unknown whether there are karst features beneath the field where wastes are applied. The resistivity test by Dr. Hallihan mentioned shows karst features in Field 12, you also state their are no results available, untrue. Under Groundwater, page 3-9 you state the highly soluble nature of the cherty limestone of the Boone Formation has given rise to the development of karst terrain and pervasive occurrence of karst features, such caves, sinkholes and springs. There is a hydraulic connection of surface water and groundwater that typifies the Boone Formation. ETC.
It is apparent this draft EA is skirting the issuers and wants readers to remain ignorant of the action that C & H Hog Farm was permitted in a karst topography in which BCERT would like nothing better to make this facility sustainable (the title MONITORING THE SUSTAINABLE MANAGEMENT OF NUTRIENTS ON C&H FARM IN BIG CREEK
WATERSHED), as that is Dr. Andrew’s speciality.  
See “Rolling Out the Science” Dr. Van Brahana, Van Brahana, Ph.D., P.G,Professor Emeritus, U of A,Research Hydrologist Emeritus, USGS

I searched the drillers log, either these are the incorrect #’s for the wells or they don’t exist.

Page 3-14
It is impossible to know the direction of flow from a leaking pond without following it. This requires draining, digging until you reach the end of the flow or dye tracing. Dr. Brahana was denied access to the lagoons to trace them.

Page 3-18 Here data referred to is BCERT where much of the data is missing. C & H Hog Farms begins spreading hog waste Jan 1 of each year continues until hay cutting season. The begins again. See, cool season applications. This area is known for winter snow and ice. Winter and spring rains will continue until the end of July as this year did. It is unpredictable when the rains will come or what area will be rained upon. The mountains and valleys divide the storms and one may get it where another does not.

431 acres of applicable land not 630 acres.

Data is selective therefore it is impossible to know by this report if C & H Hog Farms is affecting any water, let alone surface water. Considering it applies waste throughout the year whether there is grass to uptake the nutrients, that C & H Hog Farms would be contributing to the algae growth that is visible, the higher nitrate readings at the USGS site, well data reports of e coli and chloride in the house well and through excrement that is evaporated and then released back to the ground by fog and precipitation.

Page 3-19
What information do you know that states accidental discharge of waste would result in short-term impacts to surface water quality or how much would it cost to clean up accidental discharge? This is not included and SIGNIFICANT especially to the economics of the area.

The impacts to the CAFO would not be significant, but to tourism and other business’ such as canoe outfitters a discharge could be very significant. To me as a landowner on a stream in Arkansas I am very concerned with the discharges upstream from me as I’m sure other land owners are. Arkansas Game and Fish, The Buffalo National River, White River and all the people downstream are very concerned with discharges whether purposely or professionally.

Page 3-20
Drillers Log indicates karst features. See Page 3-23
Check the topo map, C & H is only 23 acres and its not nearly flat.

Page 3-24
2013 BCRET Field 12 gravel lenses and dissolution cavities are karst features. I differ on the 49” of soil overlying any bedrock. See google earth and limestone outcrops in fields 1, 4, 13, 15, 17.

Page 3-25
It is already determined C & H Hog Farms is on karst, it is your job to prepare an environmental assessment of the impacts C & H Hog Farms 4 plus million gallons of hog waste applied to fields underlain with karst, leakage of lagoons will result in. The geologist in the BCRET Team is aware this is karst, surely the geologist Krista Dearing, knows how to read the resistivity test and knows geological terminology.

Page 3-25
Threatened and Endangered Species. This section is very important and one Judge Marshall thought very important. For this section there were no impacts considered outside of C & H Hog Farms. As a caver, there are impacts not listed that personally I am concerned with. Many years ago my husband & I were requested to check out a cave that a land owner was getting his well water from. He had never entered the cave but his water quality had changed and had smell that was preventing his family from wanting to bathe or drink. He had owned this land many years and worked from home. We rappelled down the bluff and entered the large opening with walking and crawling passage until we reached the pool of water and the pipe that supplied his home with water. This was the worst cave experience I had ever gone on. The smell and goo were offensive and we quickly exited the cave and changed clothing. He lived near large chicken houses and the land was saturated with over application of chicken, turkey litter. John Eddings Cave is downstream from this cave. It houses and endangered Gray Bat colony. This CAFO could have a SIGNIFICANT IMPACT on the bats.

Page 3-26
Survey of Threatened and Endangered Bats Species on Big Creek, James Gore. This study shows Gray Bats, Northern Long Eared Bats, and Indiana Bats all less than 2 miles from the CAFO, one site is less than ½ mile from the actual confinement area and within feet of a spreading field.

Page 3-33
I own farm land and fertilizer is expensive, I wouldn’t just go put it on the field without consideration. Remarks stating that “historically those fields have been fertilized at un-managed rates and without buffers near waterways or the implementation of other BMP’s” is an assumption and makes judgement not documented by testimony. I have
spoken with the farmers in the Big Creek Valley, they know their land, its yields and its history.

Statement saying “There is no evident conduit for groundwater to reach surface water in the area. (This is an assumption not supported by facts and differs with other statement made in this EA) Any nutrients that might be leaking form the holding ponds would likely be bound to soil particles, particularly undeveloped soils, minimizing the potential for them to eventually enter groundwater.” Still in Karst…
The dye study by Dr. Van Brahana shows dye coming out in a spring 9 miles from the CAFO near the Buffalo River. This spring is utilized as a water source for local residents.

60-mm HDPE liners…I tried internet, couldn’t find them
80-mmHDPE cover….same, couldn’t find them
If these are indeed the 60 mil liners I was unable to find a company that actually installs them after the fact. They leak, rip and tear, often when this happens no one noes until the liner floats to the top.

You again talk of modifications. This will be continual as long as this CAFO is allowed in the Buffalo River Watershed. It is historically written all over the internet of the contamination of large confined swine operations.

Page 3-35 You update the activities of C & H and future activities but your data for the Buffalo National River is outdated. Try again. Again many errors in this document.

Any impact to the Buffalo River is SIGNIFICANT.

Page 3-36 ODOR, subjective described in the dictionary is an adjective and means, based on or influenced by personal feelings, tastes or opinions? odor described in the dictionary is a distinctive smell. C & H Hog Farms odor is noxious, it causes me a scratchy throat, headaches and runny nose. A float trip down the Buffalo River from my home to Carver one evening caused personal health issues. The smell of the hogs and lagoons permeated the air from Hasty to Carver. The last 2 hours of our canoe trip was disgusting, that is subjective, but the smell, that is odor and it is distinctive.

No significant odor impacts….Ask the residents that live around the CAFO, ask the residents that live in Mt. Judea, ask the school children. Their are significant impacts. I know several people living within 3 miles of the CAFO that are having health issues. I live 8 air miles away and I smell it at my home, its SIGNIFICANT!

Here’s a letter that was published regarding the odor of the C & H Hog CAFO, Sexton Cemetery is closer than the school, see the map I turned in at the public meeting:

*Last week I took my Mom and Aunt to the old Sexton Cemetery in Mt.*
Judea. It's a sweet tradition; they gather their whisk brooms and cleaning supplies and go to the cemeteries where their loved ones are buried, and sweep off and wash the headstones, remove last year's decorations and replace them with their new, carefully selected flowers. (I notice a lot of others also do this traditional caring and cleaning.) They fuss over the flowers, trying to arrange them to their prettiest and secure them so a strong wind won't blow them away. It's more precious to me every year - watching their little crooked backs tending the resting places of their family and where they too will rest someday.

We arrived at the cemetery and it looked lovely. (Mr. Campbell does such a beautiful job.) It was all mowed and manicured, with the big trees serenely shading the quiet plot of ground. I like coming here. My Father and brother, aunts, uncles, cousins, grandparents and great-grandparents (who were the first white people to settle in Big Creek Valley) are all buried here. If you could just take it all in with your eyes, it'd be a perfect scene; but we stepped out of the car to a horrendous and overwhelming stench of hog manure and I guess, burning hogs - distinct singed hair smell and a nightmarish sound of shrieking hogs. A horror film couldn't have had more un-nerving sounds. A burning, wailing and gnashing of teeth picture. It turned a wonderful tradition into an extremely unpleasant task. I had to tie a scarf over my face to breathe as we worked quickly to escape back into our car. Ordinarily we would stay a while after decorating and share memories or funny stories of our loved ones, or just quietly ponder and enjoy the sweet smell of blooming honeysuckle. But not this time. It seems "our fear-based" concerns have become a reality- truly sad indeed. This Memorial Day, I mourn not only our loved ones who have passed on, but also I mourn our loss of enjoyment of traditional outdoor activities - which is a loss of life as we've known it- in our little valley.

I see no mention of complaints but know ADEQ has many. Below see itemized Rainy Day Funds by Governor Beebe, why should the people of Arkansas be paying for this? Why have there been so many modifications if all the laws were followed at this so called "state of the art facility"? Why are there so many concerned people that a moratorium was placed on the Buffalo River watershed? Why have you wasted more of our tax payers money with another draft environmental study that only addresses insignificant impacts? Federal Judge Marshall ruled the first environmental assessment was flawed and cursory, why has this draft followed the first?

Carol Bitting
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University of Louisville, Concentrated Animal Feeding Operations What are the Potential Cost?

http://buffaloriveralliance.org/Resources/Documents/PG26-%20Community%20Costs%20of%20CAFOs.pdf