



November 13, 2024

Arkansas Legislative Council  
Administrative Rules Subcommittee  
State Capitol Building  
500 Woodlane St., Suite 320  
Little Rock, AR 72201

RE: Department of Agriculture Proposed Rules for Confined Animal Feeding Operations

To the Members of the Arkansas Administrative Rules Subcommittee:

I am writing on behalf of the Arkansas Audubon Society, a statewide, all-volunteer organization that advocates for the protection of Arkansas's birds and their habitats. Confined Animal Feeding Operations (CAFOs) concentrate enormous quantities of animal waste in open-air ponds. The amount of waste from even a small CAFO is equivalent to the waste produced by 16,000 human beings. Thus, CAFOs have the potential to cause immense damage to the environment either through water pollution, air pollution, or both. CAFOs cannot survive without taxpayer subsidies, and thus undercut the ability of traditional Arkansas livestock operations to compete.

**We support the proposed rule's permanent moratorium on the issuance of swine CAFO permits in the Buffalo National River watershed.** This watershed provides high-quality habitat for many bird species and other wildlife. The river also attracted over one million visitors in 2023, bringing millions of dollars to Arkansas's economy. Both birds and people rely on the pristine conditions of this river.

We request that the notification requirements as described in Reg. 6 also be required for Reg. 5 permit applications. Given the risk of both extreme pollution from CAFOs and loss of property value of neighboring land, it is only fair that those who may be affected by polluted air or water, disease, and inability to sell their property receive notice of a request for a CAFO permit. Thank you for your attention to our comments. In summary, we ask that you include the notice provisions that are required in Reg 6 be applied to Reg 5 as well. We also urge you to maintain the permanent moratorium on CAFOs in the Buffalo River watershed.

Sincerely,

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President, Arkansas Audubon Society  
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