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From: kevin_serrano@att.net [mailto:kevin_serrano@att.net]

Sent: Thursday, June 12, 2014 3:16 PM

To: Reg-Comment

Subject: Agriculture keeps our rivers clean

Kevin Serrano
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June 12, 2014

Patti Goff
Arkansas Pollution Control and Ecology Commission
101 E. Capitol Ave., Suite 205
Little Rock, AR 72201

Dear Patti Goff:

I oppose a moratorium on farms in the Buffalo River watershed. I think agriculture is a huge reason that our state is clean, beautiful and natural. Environmental regulations should be science-based and reasonable, not driven by emotion. Please consider the benefits and stewardship of Arkansas farmers before you react to misinformation in the public arena.

I have read much about the University of Arkansas research team that is studying the impact of the hog farm in the Buffalo River Watershed, and the money Gov. Mike Beebe put behind their efforts. The research being performed at the C&H Hog Farm by the Big Creek Research Team is the most extensive performed on any farm in Arkansas and likely the country.

How is it that a state commission is going to now try to get IN FRONT of that government-funded research and make decisions about the long-term impact to the Buffalo River watershed WITHOUT that data? This sounds reckless to me.

I ask that you let the research take its course and generate the science and data needed to make the right decisions concerning moratoriums, expanded restrictions being placed on private land owners, or other unneeded limitations on farmers and ranchers until AFTER the Big Creek Research Team has presented their findings so the science will speak for itself.

I am sure Gov. Beebe would appreciate the fact that the state's is being spent in the best interest of Arkansas and its citizens. If the ongoing research on C&H Hog Farm shows current regulatory requirements are not adequate, then the regulations can be modified to include additional permit requirements. This is a scientific approach. An outright prohibition based on the "potential" or "threat" is not a scientific approach.

As a group that embraces science at the core of its everyday function - to protect the water-quality and environmental resources of the state of Arkansas - it is amazing to me that the commissioners of the PC&E are allowing a third-party rulemaking proposal that is devoid of science to be considered for approval. How can you turn your back on science at the time it is most needed?

It sounds to me like the commissioners of the PC&E have embraced the language of fear and emotion that the aginners have so loudly trumpeted.

What should ring true during this emotional debate is sound science.

The decision to allow a third-party rule-making proposal to be adopted for 180 days, and considered for permanent adoption, is a poor reflection on the staff of the Arkansas Department of Environmental Quality and the PC&E Commission.

Do we not have experts on these subjects working for the state of Arkansas now? Haven't we allowed our state legislature the opportunity to enact laws that will impact our citizens, because they are the ones who stand for election? Why is it some do-gooder lawyer can step in and propose something radical and be treated as if it is the only answer to the situation? These questions all carry answers that are offensive to me, because they all imply the wrong people are making decisions that have serious impacts on our lives and livelihoods.

Ditch third-party rulemaking as an option. If hard decisions need to be made, they need to be made by ADEQ, this Commission and/or the duly elected members of the Arkansas General Assembly.

While I do not farm in the Buffalo River watershed, I am still very interested in this right to farm issue. I am concerned that the PC&E Commission is considering a permanent moratorium on hog farms in this area.

To take such a drastic measure, without the science to back up the decision, sets an extreme precedent. What happens when they decide to allow another outside 3rd Party Rulemaking group that wants to change something in another area? What happens when you chose to expand beyond limits on hogs to include dairy, beef, poultry? While I understand this only applies to medium and large farms this time, what is next? All farms?

We need every farm we have in Arkansas, in fact we need more. Please don't take an action that ultimately would impact all farms in an incredibly irresponsible way.

The willingness of the farmers at C&H Hog Farm to open their farm for testing and scrutiny is a sign of their environmental stewardship and their desire to do what is right on their farm.

The federal EPA was recently on their farm, requested by somebody who lives in a different county, I suspect, to look in on their operation. The inspector found that nothing was wrong. Contact EPA if you don't believe me. The farmer was told by the EPA investigator that he wished every piece of property he inspected was in such tip-top shape.

If the EPA, sent in to find something wrong on this hog farm, walks away saying there are no violations, then why would the PC&E Commission overreact to some group of environmental extremists who just know something terrible is happening on that farm? Why, I ask again?

I fear you are listening to the wrong group of people when you make decisions that limit the work that good people can do on their private property. Just because someone is loud does not make them right.

Sincerely,

Kevin Serrano
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