

From: Matt & Lisa Widner [mailto:wrfarm@harrisonweb.com]

Sent: Wednesday, June 25, 2014 8:47 PM

To: Reg-Comment

Subject: comments concerning changes to regulations 5 & 6

Matt Widner

10425 Ragland Dr.

Harrison, AR 72601

Mr. Doug Szenher,

Arkansas Department of Environmental Quality

Public Outreach and Assistance Division

5301 Northshore Dr.

North Little Rock, AR 72118

Dear Commissioners:

Thank you for considering my comments regarding proposed changes to Regulations 5 and 6. I do not live or own land in the Buffalo River Watershed, and normally would keep my opinion to myself on issues that only apply to that area. However, I believe these proposed changes could adversely affect, not just the families currently farming in the Buffalo River watershed, but the people of the entire State of Arkansas, and especially those of us who make our living raising food to sustain our nation. At this time I oppose any changes to Regulations 5 or 6.

Regulations 5 & 6 were put into place, after much study and deliberation, to protect the waters of the State. They have proven to be effective for their intended purpose. If they are not sufficient for the Buffalo River, they are not sufficient for the rest of the state, and should be changed for the whole state; not just for one geographical area. On the other hand, if they are effective for the rest of the state, then they are effective for the Buffalo River and should be left alone. There is extensive water quality research currently being conducted in this area. If this research shows that current regulations are ineffective, then the regulations should be changed based on this evidence. However, the idea that a third party can rewrite accepted rules based on "precautionary principle" is absurd and very dangerous

to the common good. The commission and ADEQ has done a good job of adopting and implementing rules based on science; please do not be pressured into changing them based on emotion.

The Buffalo River is important to the area, and everyone wants it to be a healthy river; but the entire watershed is not a national park for recreational purposes only. There is still a large portion of the watershed that is privately held, and people depend on this land for their livelihood. The landowners have an interest in maintaining water quality, probably more than anyone else, but they should be allowed to develop their land as long as development does not infringe on the rights of others. The current regulations assure this. There is no reason to believe that agricultural operations following current regulations will have any negative effect on water quality in the region. The idea that animals will produce more pollution, simply because they are concentrated in one location is simply wrong, and shows no understanding of current agriculture technology and operation.

Much of the reasoning presented in favor of these proposed changes center around nutrient leaching through the Karst topography of the area. This is a legitimate concern; however there is no reason to believe that there will be any increase in nutrient application because of current or future farms in the area. There have been swine farms in the area for decades that have been land applying nutrients. Current regulations already address these issues. The National Park Service or their leasees apply nutrients to fields directly adjacent to the Buffalo River. If land application of nutrients was causing problems, then why would they continue the practice?

When scientific evidence shows that changes need to be made in current regulation to protect the waters of our State, all sources of pollution should be considered. Any activity in an area, whether it be agricultural, residential, industrial, or recreational has an impact on the environment of that area. When making any changes, please consider all of these sources.

Thank you for your consideration,

Matt Widner