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June 20, 2014

Mr. Doug Szenher
Arkansas Department of Environmental Quality
Public Outreach and Assistance Division
5301 Northshore Drive
North Little Rock, AR 72118

RE: C&H Hog Farm located in Newton County, Arkansas

Dear Mr. Szenher:

The following are our comments regarding the C&H Hog Farm situation in Arkansas. We Do NOT support a complete moratorium on animal feeding operations in the Buffalo River Watershed. While the current proposal, presented as a 3rd party rule making proposal from an attorney representing environmental interests, would allow C&H to remain, it would keep the farm from ever expanding and also permanently restrict any future feeding operations of a certain size.

We do NOT support this moratorium on animal feeding operations in the Buffalo River Watershed for several reasons and some of them are below:

- 1) This proposed moratorium is based on emotion. There is no evidence that C&H Farms is harming the river or that other farms like it would harm the river.
- 2) The land in the Buffalo River watershed, the land in every watershed, is working land not simply a playground for visitors.
- 3) Landowners should have options about how they use their land and farming is a viable option in rural Arkansas. Restricting land use to the point of a moratorium is a dangerous precedent to set.
- 4) Third party rulemaking is a troublesome way to set regulations. Where does it stop? Can someone halt the types of crops planted in Arkansas? Could they halt the application of poultry litter? Can anyone with a cause or grudge begin to make rules for everyone else?
- 5) Agriculture can be and is a tremendous benefit to the environment. It provides greenspace buffers for water and habitat for wildlife.
- 6) We oppose arbitrary moratoriums and restrictions on land use.

The decision to allow a 3rd 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. Ditch the 3rd 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.

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 in the country. We 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.

Agriculture is under attack across the nation from those who don't understand its mission or benefits. People who know little about modern farming are working to regulate and legislate the family farm out of business. Please don't be another obstacle for farmers to overcome. Never in history has agriculture been so attacked and vilified. Don't let this happen in Arkansas. Remember No Farms – No Food.

C&H Farms has followed the law laid out by ADEQ. They have the proper permits and went through the process established by the agency. This farm is not the problem. Other future farms like it are not the problem. Let's not limit agriculture more in this area because people like to visit there. Please have some consideration for the citizens living in the Buffalo River watershed.

Thank you for listening to our comments. I believe you know what is truly going on here is unconstitutional and trying to take farms, land, livelihoods away from private citizens because a few people who think they know something but really do not or outside interests trying to impose restrictions on harmless entities is not the way we do business in Arkansas or in the United States.

Sincerely,

Russell L. Corker



Mary Ann Corker

