




April 13, 2016

To: Arkansas Department of Environmental Quality
Attn: Permits Branch
5301 Northshore Drive
North Little Rock, AR 72118

From: Arkansas Farm Bureau Federation
Mr. Evan A. Teague, P.E. 
Vice President, Commodity & Regulatory Affairs
P.O. Box 31
Little Rock, AR 72203

Re: CAFO General Permit (ARG590000) Renewal

To ADEQ Office of Water Quality Permits Section:

The Arkansas Farm Bureau Federation welcomes the opportunity to comment on the renewal of the CAFO General Permit. We submit these comments on behalf of our more than 190,000 member families across the state.

EPA Region 6 has reviewed the draft CAFO General Permit and had no objections. This means that EPA believes the permit is protective of the environment. We concur with the EPA's assessment and believe the CAFO General Permit, as proposed in this draft, is protective of the environment. We encourage the Arkansas Department of Environmental Quality (Department) to reissue this permit unchanged with the exception of those changes listed on Page 2 of the CAFO General Permit Fact Sheet under *Section 2. Major Changes from Previous Permit*.

The changes listed on the CAFO General Permit Fact Sheet were incorporated over the past two years in an effort to accommodate the concerns of the environmental community. We still believe the changes in Part 1.4.7 and Part 5 were excessive and unnecessary. The premise behind making these changes, specifically those detailed in Part 1.4.7, was to prevent additional hog farms from being permitted in the Buffalo River Watershed and to leave the CAFO General Permit unchanged while the Big Creek Research & Extension Team (BCRET) completes its evaluation. These changes also included specific language incorporating a time specific sunset clause into Regulation 6. At the conclusion of this evaluation the BCRET will issue its findings to the Department for its consideration as well as the commission's, the legislature's and the governor's. At that point the Department is required to initiate rulemaking to remove language from Regulation 6 that will either end the moratorium or leave it in place. If the environmental community wanted additional changes to this regulation beyond these, they should have sought to have them incorporated as part of their 3rd Party Rulemaking process.

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From: Evan.Teague@arfb.com
To: [Water Draft Permit Comments](#)
Subject: ArFB Comments on CAFO General Permit Renewal
Date: Wednesday, April 13, 2016 9:46:07 PM
Attachments: [ARFB - Comments on CAFO General Permit Renewal - Final 04-13-16.pdf](#)

Please find attached the Arkansas Farm Bureau Federation's comments on the CAFO General Permit Renewal

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