

**From:** aandbeddings Email [mailto:aandbeddings@ritternet.com]  
**Sent:** Friday, June 27, 2014 11:31 AM  
**To:** Reg-Comment  
**Subject:** Proposed Changes to Regulation 5 and Regulation 6

Dear Commissioners:

Thank you for taking the time to review my comments regarding the proposed Third Party Rulemaking changes to Regulations 5 and 6.

I oppose any changes to these regulations for the reasons outlined below.

No valid scientific evidence has been produced to support these changes. If you decide to ban swine CAFOs in the watershed, are you basing your decision on actual scientific facts produced by reputable scientists, or are you basing your decision on the hope that it may make this issue go away if you give in? Please do not make a knee-jerk decision based on what-if scenarios simply because activist groups are upset about a farm that they have an entirely misconceived perception about.

Hog farms have been in the Buffalo River watershed for decades without problems and should be allowed to remain, and grow, in this area. Banning farms of certain sizes is discriminatory, and it is an encroachment on our right to farm in this state. ADEQ's current regulations have proven effective and basically provide limits within themselves. A farmer must justify that enough land is available to disperse the liquid fertilizer. If the farmer is unable to justify that enough land is available, then the current regulations will prevent that farmer from being able to construct a new facility or add to an existing facility.

Why are swine farms being singled out? Has it been determined by the scientific community or the scientists you consult that swine CAFOs are more harmful to the Buffalo River Watershed than any other type of farm? If you base your decision solely on what will satisfy these very outspoken groups and not on scientific data, what will be next? Are anti-farm proponents going to then propose limits on the number of cattle we can own? If you set a precedent of making decisions without scientific proof, you will be opening up every type of agricultural industry in this area to undeserved, unwarranted scrutiny. Farming is already difficult enough. Please do not add to the problems farmers face by inviting undue burden and stress to their load.

I have trouble understanding why people have such a problem with farming in the watershed but overlook the fact that there is human waste being dumped directly into the river by the thousands of gallons by the Park Service itself. There are vast numbers of wildlife urinating and defecating directly in the river, and some of those animals would not even be here if they had not been intentionally released into the watershed by government agencies. Are the proposed changes really about protecting the Buffalo? If so, then all potential threats to the Buffalo need to be considered. Recreation and tourism should not be given a free pass to pollute. There is absolutely no way that the 1.5 million people the Park Service professes to visit the Buffalo River can not have an impact, especially when the Park Service closes down restrooms all along the river. The anti-hog farm extremists will say that the river is at its capacity for handling the contamination load placed on it and, therefore, cannot handle the addition of any more swine in

the watershed. If that is the case, maybe we should also limit the number of visitors to the watershed to help cut down on the “potential threats”.

I have heard over and over how C & H Farms is going to hurt the tourism industry. It seems rather ironic for the anti-hog farm extremists to assert this since they are solely responsible for generating all the negative press and publicity. I also found it rather amusing that the petitioners stated they would arrange for publication of the legal notice of the rulemaking in the Arkansas Democrat Gazette and in the Harrison Daily Times. Isn't this rulemaking being pushed by the same groups of people who were up in arms at the onset because the public notice published on behalf of C & H Hog Farm didn't run in the local paper, i.e., the Newton County Times? In fact, as far as I am aware, not one section of the Buffalo River is in Boone county, which is the county the Harrison Daily Times covers. Does it not seem ironic that they themselves decided not publish their notices in the counties that are actually affected? I guess what's good for the goose isn't good for the gander after all.

The environmental extremists say there are better places to locate a swine farm. It seems to me that no matter where a CAFO is established, extremists always say “there's a better place”. Where exactly do they think it is ok to establish a farm? In outer space? They don't want you to build one in the city because there are too many people; oh but wait, you can't put one in the country either because the country should be reserved as a tourist attraction for people who come from the city. The extremists accuse companies like Cargill of targeting underprivileged communities where the local folk don't feel empowered to speak up for themselves. People who live in the country are not incapable of speaking up for themselves. I am one of those people. While we may be of few words and do not feel compelled to have something to say about every issue under the sun, we don't need outsiders to come in and speak for us. I live in the Buffalo River Watershed and have all of my life. All of my children and grandchildren live in this community. I want them to be able to stay in the community, and to do that, they have to have jobs here. Farming is one of the few things we have left. Please do not strip that away one piece at a time. Please deny the proposed Third Party Rulemaking changes. Please do not allow yourself to be bullied into a decision by these environmental extremist groups because you think it will make your job easier. It won't; it will simply open the flood gates.

Sincerely,

Betty Eddings  
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