

June 12, 2014

ADPC & E Commissioners
c/o Mr. Doug Szenher
ADEQ - Public Outreach and Assistance Division
5301 Northshore Drive
North Little Rock, AR 72118

Dear Commissioners:

I want to thank you for the opportunity to comment on the proposed Third Party Rulemaking to change Regulations for State Administration of the National Pollution Discharge Elimination System and Regulations 5 and 6 entitled Liquid Animal Waste Systems.

Please know that I am strongly opposed to any changes made in these regulations. I oppose changes, as an individual and President of Farm Credit Services of Western Arkansas, for the following reasons.

My life-long involvement with agriculture has given me an appreciation and ability to recognize that the overwhelming majority of farmers and ranchers have the deepest respect for the rural environment since it is their location, livelihood and passion.

That passion is openly demonstrated by the community of Newton County which has responsively and energetically supported C and H Farms and its operations under the first CAFO permit issued in the State of Arkansas. To the best of my knowledge, C and H Farms followed all the laws and regulations to obtain their permit for their 2500 head Swine CAFO, followed all the laws of their permit and have operated their farm in a very responsible, environmentally-friendly manner, going above what has been required of them.

Wanting a continuing, prestigious Buffalo River Watershed, I believe that the Commission should base its decision on science, not supposition. Family pork production units, like C and H Farms, have operated swine farm located in the Buffalo River Watershed for decades. The Buffalo River remains pristine. History shows that the Buffalo River and well-managed swine farms can co-exist.

I would like to ask the Commission to leave the regulations in their current form and let the research and science take its course. The research being performed at the C and H Family Farm by the Big Creek Research Team from the University of Arkansas is the most extensive performed on any farm in Arkansas and possibly the nation. This will provide the scientific data to see if any changes are necessary instead of basing the commission's decision on fear and emotion of out-of-the-area dissidents. I believe this Third Party Rulemaking is an effort to get out in front of the scientific results of this state-funded study.

Also, I believe that making the changes in the Third Party Rulemaking sets a very negative precedent, not based on science. This could set up a foundation that could eventually affect all Extraordinary Resource Watersheds in Arkansas. Yes, I know this Third Party Rulemaking only applies to the Buffalo River Watershed, Medium and Large Swine CAFO's. However, what is next on the proponents of the Third Part Rulemaking's agenda against agriculture production?

Their attempts, last year, gives us an idea. Proponents of the Third Party Rulemaking made an unsuccessful attempt in the 2013 legislative session to ban swine farms from the Buffalo River Watershed and "all extraordinary resource watersheds" in Arkansas. Viewing the map of their desired legislative attempt, it covers and extraordinary portion of Arkansas and would affect agriculture interests and assets in a very high degree. Knowing this, it is a terrible precedent for the Commission to make, especially when they have no scientific basis to make it on.

American Agriculture is the backbone of our economy and our country. In fact, Farm Credit of Western Arkansas deals directly with more than 5,000 farmers and ranchers. Our state's agricultural producers, including swine, have an excellent environmental record. They have proven to be responsible environmental stewards and have been pro-active in working with ADEQ and its commissioners in meeting the challenges that have faced them. The Third Party Rulemaking of Regulation 5 and Regulation 6 is an infringement to farmer's right to farm and private property rights. Again, the Commission needs to deny the Third Party Rulemaking on Reg. 5 and Reg. 6.

In summary, I would like to thank you for allowing me to comment on these proposed changes. One again, I would like to ask the ADPC and E Commissioners to make their decision on sound scientific facts and a long history of Arkansas' farmers and ranchers being thoughtful stewards, not on emotion and imaginations, and deny any changes to Regulation 5 and Regulation 6.

Sincerely,



Glen M. Manchester

President and CEO