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From: jason@parksbrothers.com [mailto:jason@parksbrothers.com]
Sent: Monday, June 30, 2014 3:54 PM
To: Reg-Comment
Subject: No Third Party Rulemaking at ADEQ

Jason Parks
6724 Parks Road
Van Buren, AR 72956-8605

June 30, 2014

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

Dear Doug Szenher:

Hello,

I am writing to inform you that as a farmer and specialty crop grower, I am opposed to the moratorium from the third party ruling for Regulation 5 and Regulation 6.

In my opinion, allowing 3rd Party Rule making without scientific study or data fundamentally alters the ADEQ and allows for much wider and politically motivated rule making.

Allowing this ruling on the moratorium to proceed sets a dangerous precedent which could affect not only the Buffalo River watershed but any watershed in the state and any agricultural business operating in a watershed.

I believe those behind this request, if emboldened by your actions, will be back before this Commission and at the state legislature trying to expand the scope to include other farms and other businesses that they find unnecessary. That will be disastrous.

As a group that embraces science at the core of its everyday function - to protect the water-quality and environmental resources of the state of Arkansas - it is amazing to me that the commissioners of the PC&E are allowing a third-party rulemaking proposal that is devoid of science to be considered for approval. How can you turn your back on science at the time it is most needed?

Once again, I oppose a moratorium on farms in the Buffalo River watershed. I think agriculture is a huge reason that our state is clean, beautiful and natural. Environmental regulations should science-based and reasonable not driven by emotion. Please consider the benefits and stewardship of Arkansas farmers before you react to misinformation in the public arena.

I 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.

I am sure Gov. Beebe would appreciate the fact that the state's money is being spent in the best interest of Arkansas and its citizens. If the ongoing research on C&H Hog Farm shows current regulatory requirements are not adequate, then the regulations can be modified to include additional permit requirements. This is a scientific approach. An outright prohibition based on the "potential" or "threat" is not a scientific approach.

Additionally, I oppose third-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 fear you are listening to the wrong group of people when you make decisions that limit the work that good people can do on their private property. Just because someone is loud does not make them right.

Sincerely,

Jason Parks
4794741125