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From: pitchford50@gmail.com [mailto:pitchford50@gmail.com]

Sent: Friday, June 20, 2014 10:22 PM

To: Reg-Comment

Subject: No Third Party Rulemaking at ADEQ

Roger Pitchford  
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June 20, 2014

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

Dear Doug Szenher:

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 be 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 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 the country.

How is it that a state commission is going to now try to get IN FRONT of that government-funded research and make decisions about the long-term impact to the Buffalo River watershed WITHOUT that data? This sounds reckless to me.

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.

While I do not farm in the Buffalo River watershed, I am still very interested in this right to farm issue. I am concerned that the PC&E Commission is considering a permanent moratorium on hog farms in this area.

To take such a drastic measure, without the science to back up the decision, sets an extreme precedent. What happens when they decide to allow another outside 3rd Party Rulemaking group that wants to

change something in another area? What happens when you chose to expand beyond limits on hogs to include dairy, beef, poultry? While I understand this only applies to medium and large farms this time, what is next? All farms?

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?

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,

Roger Pitchford  
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