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June 3<sup>rd</sup>, 2014

Mr. Doug Szenher

Arkansas Department of Environmental Quality

5301 Northshore Drive

North Little Rock, AR 72118

***Submitted by Electronic Mail to: [reg-comment@adeq.state.ar.us](mailto:reg-comment@adeq.state.ar.us).***

**RE: Docket # 14-002-R and 14-003-R**

Dear Mr. Szenher:

On behalf of the Arkansas Sierra Club, I am writing to express our support for current efforts to amend Arkansas Pollution Control and Ecology Commission Regulations 5 and 6, to ban any new medium and large confined and concentrated swine operations in the Buffalo National River Watershed.

Formed in 1892, Sierra Club is the nation's oldest and largest environmental advocacy group. Our 2.4 million members and supporters (including thousands of Arkansans) are committed to protecting our nation's air, water, forests, and special places. The Buffalo River is one of those special areas.

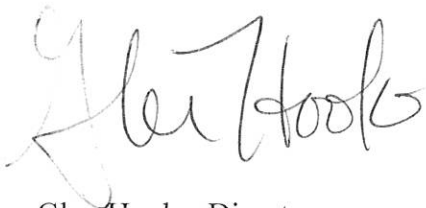
Our reasons for supporting this third-party rulemaking are several. First and foremost, the Buffalo National River is an Arkansas and American treasure. We remain strongly opposed to the existing Cargill swine operation in this important environmental area, but feel that taking the step to ban the development or permitting of any future swine operations in the watershed makes sense.

This treasure is located in area dominated by porous, limestone Karst topography. Pollutants in the watershed can reach the Buffalo River very quickly. As such, it makes little sense to apply millions of gallons of hog waste to the land in the area—doing so will absolutely ensure that the Buffalo River becomes polluted with nutrients, bacteria, and other pollutants. In addition to the risks posed by land application of hog waste, the River is also put at risk by potentially catastrophic failure of waste holding ponds for swine facilities.

Each of these risks poses great danger to not only the water quality of the Buffalo River, but put tourism dollars and public health at risk. Each year, thousands of people from Arkansas and other states come to enjoy the Buffalo River and recreate in the area. Degradation of the Buffalo River will cost significant amounts of tourism jobs and put at risk the health of those who come to this special area.

In short, Sierra Club wholeheartedly supports the efforts of the Ozark Society and the Arkansas Public Policy Panel to amend PC&E Regulations 5 and 6. We urge you to amend these regulations and protect one of Arkansas's most treasured areas.

Sincerely,

A handwritten signature in black ink that reads "Glen Hooks". The signature is written in a cursive, flowing style.

Glen Hooks, Director

Arkansas Sierra Club