

Bill Shannon
3002 Oakridge Dr
Jonesboro, AR 72401-8213

June 11, 2014

2014 JUN 18 AM 4:

Patti Goff
Arkansas Pollution Control and Ecology Commission
101 E. Capitol Ave., Suite 205
Little Rock, AR 72201

Re: I stand with family farmers

Dear Patti Goff:

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.

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?

The decision to allow a third-party rule-making proposal to be adopted for 180 days, and considered for permanent adoption, is a poor reflection on the staff of the Arkansas Department of Environmental Quality and the PC&E Commission.

Ditch 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.

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?

Sincerely,



Bill Shannon
870-761-5649