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From: Don Hubbell <Don.Hubbell.403628700@foradvocacy.com>
Sent: Sunday, September 15, 2024 3:31 PM
To: Public Comment
Subject: Comments on Proposed Reg. 6

Attn: Carol Booth

I am writing to express my strong opposition to the proposed rulemaking that seeks to establish a permanent moratorium on hog farms in the Buffalo River watershed. This moratorium represents a significant overreach that undermines the existing regulatory framework, disregards individual property rights, and threatens the long-standing tradition of agricultural production in our state.

The Arkansas Department of Environmental Quality (ADEQ) already possesses the statutory authority and expertise to review, approve, or deny permits. The current regulatory framework ensures compliance with state and federal environmental laws through environmental assessments, public input, and enforceable permit conditions. ADEQ should be trusted to fulfill its responsibilities by addressing potential impacts on a case-by-case basis. Water quality is addressed through the existing permitting and enforcement mechanisms. A moratorium is both unnecessary and disproportionate given ADEQ's authority and capabilities.

The proposed moratorium reaches well beyond protection and erodes an individuals' rights to farm on their own land. Agriculture is a foundational part of Arkansas' heritage and economy, especially in rural areas. Rather than implementing a moratorium that could limit agricultural opportunities in the watershed, we encourage the Department to rely on its existing regulatory authority to evaluate permits based on scientific evidence and site-specific conditions. If we begin to selectively prohibit farming activities in certain areas without solid science and case-by-case review, it undermines the right to farm that has long been respected in Arkansas.

I urge the Arkansas Pollution Control and Ecology Commission to reject this rulemaking and instead allow ADEQ to continue overseeing the permitting process under the current framework.

Regards,
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