

# Stuart Brasel

To ADEQ Decision Team:

Decisions of this nature often bring with them many different political pressures. Often pushing the deciding team to be exposed to undue stresses. None the less, this particular issue about the potential of the Buffalo National River receiving excess contaminants is a rather significant one. Many times environmental agencies are faced with these important topics. I too, have been around similar decisions and seen the outcomes. In the end, it's impossible to please all parties to their utmost satisfaction. However, almost everytime a decision is made, it is possible to reach a compromise that touches aspects of each party's interests while still maintaining sound and environmentally safe operations. With that I would like you to think about the following alternative decision with rationale behind it.

First, the ADEQ must make an environmentally safe decision about the operation of a large swine production facility within a popular and rather sensitive watershed. All the while, maintaining support from all interest groups to streamline future decisions made by ADEQ. Maintaining support from all groups will aid the department in the future by ensuring Arkansas citizens that honest, trustworthy decisions are being made that lookout for the best interest of everyone and not just one particular group. It is my experience that severe lop-sided decisions will only gain support from one side and in this case will rapidly increase the resentment of either interest group that sees themselves in a losing outcome. Future decisions will be appealed and lead to many more tax payer dollars being spent in litigation and lawsuits rather than important monitoring protocols in all the other sensitive water bodies in Arkansas. In some cases, individuals have been sued when they didn't dot all the i's and cross their t's. So please do what's best for everyone in the name of civility.

Next, a decision in complete favor of C&H Hog Farms continuance of operations with no mitigations addressing the environmental concerns brought forward from groups like the BRWA will definitely leave their interest groups in total disarray and will eventually lead to more appeals and litigations where more and more tax payer dollars would be spent instead of important water quality studies in other water bodies of Arkansas. We, the people of Arkansas, depend on sound professionals from within ADEQ to maintain environmentally safe decisions by implementing logical scientific practices and monitoring protocol of all streams, reservoirs, watersheds, etc. When you spend your budget focusing more and more on litigation within one watershed, many others are being neglected. This leads to distrust from farmers and many others such as what we are seeing now.

With that being said, BRWA wants a no operation decision. Would this ensure that C&H Hog Farms never contributed pollutants into the waters of the Buffalo River watershed? Sure it would! Do we all know that the waters within the Buffalo River watershed will still have pollutants if C&H never runs another pig through their facility? Sure we do. We're not all hydrology experts like the ones we depend on within ADEQ Division of Water Quality but we are intelligent enough to know that C&H is not the only potential pollutant to the watershed. Also, will ADEQ be finished when they issue a denial? No, they will be appealed by supporters of all types of farm operations within Arkansas and the department will lose the trust of many people. Will the department be at risk of more lawsuits? Sure they will. There is a strong farm base in Arkansas.

At the same time, many small farms are afraid of "being next." We ask ADEQ to support all parties

because we really do depend on your professionals to guide us in an environmentally safe manner while maintaining the highly productive agricultural economy Arkansas is known for.

Therefore, in conclusion, we the supporters of all farming operations including C&H Hog Farms would like to propose that the operation of hog farming continue and to allow these hardworking families to provide jobs and revenue for our small community. Due to the location of C&H hog facility within the sensitive Buffalo River watershed, the potential amount of waste produced, and because there have been no current findings of contributions of pollutants into the watershed from the hog facility; we would like ADEQ Division of Water Quality to address the concerns of pollution by developing monitoring protocol to mitigate the potential for any negative impacts caused by C&H operations. In response to the potential of negative impacts caused by excessive leaching of fertilizer, there can be action plans in place as to the restriction of timing on fertilizer applications to prevent excessive leaching of nitrogen, the amount of fertilizer to be applied per acre will be limited to ?? Dry tons/acre or ?? Liquid gal/acre. In an effort to address the concerns of the leakage of manure holding ponds, when monitoring determines pollutants are reaching unsafe depths below surface then C&H must cease all storage and remove manure until remedies can be applied to prevent potential contamination of ground water. In the event that C&H fails to comply with monitoring program and prevention plans, all permitted operations will be suspended until conditions are met. Setup control streams where there is nothing but nutrient byproducts of natural decomposition being added to the stream so people know for sure that the data is not skewed to fit the interests of one group. You're the experts we depend on!!!

In the end, we depend on ADEQ to make decisions that will be of the best interests of all Arkansas residents; not just farmers and not just environmental groups. We all have a job to do and want to make a difference so let's make a difference for everyone involved. Keep it safe and keep it running!

I SUPPORT C&H!!!