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January 29, 2016

CHHogFarmComments@cardno-gs.com

C&H Hog Farm Comments
c/o Cardno
501 Butler Farm Rd
Hampton, VA 23666

Re: Comment on Final EA of C&H Hog Farm and Draft Finding of No Significant Impact

Friends of the North fork and White Rivers (*Friends*) submits these comments on the draft Final Environmental Assessment (FEA) that was submitted by the SBA (Small Business Administration) and the FSA. The Friends organization represents the interests of individuals in and near the middle section of the White River watershed, including the Buffalo River watershed.

Friends agrees with the comments of the Buffalo River Watershed Alliance and as well as the comments of Richard H. Mays. The requirements set forth under NEPA have not been met in the FEA, especially in the context of the "hard look" requested by Judge Marshall.

- It fails to adequately address the direct, indirect, and cumulative effects of the hog farm waste storage and ground application on the unique sensitive environment of the Big Creek and Buffalo River.
- The FEA alludes to ongoing studies of the farm site karst geology but dismisses the studies by reputable scientists as inconclusive, or as from a study not available on the EPA database, or that needs more information, or that needs additional analysis that could enhance the delineation of karst features. However, the FEA admits that the quantity of data from the BCRET study is incomplete, but accepts the data to draw conclusions.

The National Park Service made an appeal to the Arkansas Department of Environmental Quality (rejected) to have Big Creek added to the 303(d) list of impaired waters. Why must we wait until the direct, indirect, and cumulative effects of the hog farm waste lead to the necessity of remediation? A hard look at all evidence points to present harm to the human environment as well as the potential for greater accumulation of harm.

Friends requests an environmental impact study to determine more fully the extent of the CAFO operation upon the environment.

Sam D. Cooke

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President,
Friends of the North Fork and White Rivers

Friends of the North Fork and White Rivers is an Arkansas 501(c)(3) non-profit organization devoted to creating an ongoing dialogue where individuals, groups, and government agencies can work together to conserve, restore and enhance these beautiful rivers.