

CHHOG EA
c/o Cardno, Inc.
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This EA fails to address the following in a meaningful scientific way, ignoring relevant easily accessible data and cherry picking the data it wants to support the outcome of FONSI.

Impairment to the water and aquatic habitat occurs overtime. This (EA) and (FONSI) do not take into account cumulative impacts to the aquatic habitat, water quality, and threatened and endangered species of bats and mussels.

The EA's statement that "*geotechnical investigation did not encounter karst features beneath the C&H Hog Farms facilities*" is also full of holes. First, the geotechnical investigation to which the EA refers is in no way any kind of actual karst survey.

Second, independent dye trace studies show that there is subsurface movement of water near and around the spray fields into the Buffalo National River and caves within the national park boundary. This is indicative of karst.

Third, an Electrical Resistivity Imaging (ERI) study done by Oklahoma State University shows clear evidence of subsurface karst features in the spreading fields of C&H as well as a shallow water table and "...the possibility of hog manure electrical signatures present on Field 12."

The EA relies on the C&H Nutrient Management Plan (NMP) and National Pollution Discharge Elimination System (NPDES), but C&H has applied to add additional acreage for spray fields in the watershed, which calls into question the validity and inadequate nature of C & H's NMP as permitted by ADEQ. This would

suggest need for further investigation.

The substantial environmental impacts of CAFOs are becoming clearer and clearer. National Environmental Policy Act requires USDA/Small Business Administration to do an Environmental Impact Statement given that significant environmental effects may or will occur.

The repeated phrase of inconclusive evidence throughout this EA should be concern enough to merit an Environmental Impact Statement.

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