

Please accept these comments concerning the EA Final Draft on the C&H Hog CAFO.

The finding of “no significant impact” for the C&H CAFO Final Draft EA appears contrary to the reports available from findings of the BCRET (Big Creek Research and Extension Team) study, Kosaic, and the NPS. Please see examples below:

According to BCRET 1) Nitrate - N concentrations in Bg Creek continue to be greater below C&H than upstream measurements. 2) A 400 foot deep house will adjacent to manure ponds has shown periodic high values of bacteria and Nitrate-N. This would appear to indicate impact.

From the National Park Service - as a result of regular water tests, the NPS has requested that Big Creek be classified as “impaired waters”. This appears to indicate impact.

According to AR standards for water quality, nutrients such as Phosphorus and Nitrogen should be in concentrations low enough not to cause excess algal growth. However photos show a mass of algae downstream of C&H, in comparison to upstream. Report authors omitted this evidence of impairment from their report.

The EA has ignored concurrent studies in which dye tracing found location in various surface drainage basins, including detection in the Left Fork of Big Creek, which BCRET uses as a control, supposedly not influenced by C&H area drainage, in their study.

The fields BCRET has included in it’s study are incomplete, as out of 17 application fields, only parts of 3 fields are considered in the study, and fertility management practices on one of these is unknown to the BCRET study.

While the study is supported by tax payer funding, and BCRET was appointed to monitor risks of pollution to a National River, the scientific team, having connections to the Farm Bureau, also would have interest in the success of C&H as a productive Arkansas industry. Therefore, the EA,

should contain reports of concurrent studies which have produced added, and in some cases contradictory, evidence.

Thank you.

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