

September 3, 2015

To whom it may concern:

I find this EA continues to be "flawed and cursory" as was the ruling by Federal Judge Marshall in December 2014 of the original EA of C & H Hog factory in Mt Judea, AR. It appears the authors used their computers to cherry-pick the work of others in an effort to produce this recent EA and attempted to put a positive spin on a very locally divisive and potentially risky and damaging factory hog plan. I can't imagine that anyone from your company visited the actual site and saw the 2 waste ponds with millions of gallons of hog waste situated on steep slopes in karst topography above Big Creek or the flood prone fields where the raw waste is spread near the Mt Judea School and Big Creek on fields that are already overloaded with excess nutrients. If anyone had come in person they would have smelled the rank odor and observed the precarious nature of this ill-sited hog factory. It doesn't take a scientist to know waste goes down hill and that Big Creek flows into our National Treasure, The Buffalo National River. This was a poor decision to place C & H factory on karst from the beginning. It puts Newton County Arkansas' biggest economic engine at catastrophic risk. I am also concerned for the health of the students at Mt Judea Schools and the neighbors of the hog factor who are forced to breathe the toxic fumes from the

millions of gallons of raw hog waste with no choice.

As a stakeholder in Newton County Arkansas who earns a living in the tourism industry related to the Buffalo National River I do not agree that this factory presents no risk to the ground water, streams, the Buffalo National River and endangered species and people in our county. On the contrary it presents certain risk on this karst site. The taxpayers money should never guarantee loans for such an environmentally flawed and dangerous plan. The benefit to 3 families unfairly risks the clean water, air quality, quality of life and livelihood of hundreds who depend on, enjoy and live near the river. The Buffalo River became the Buffalo National River by Act of Congress on March 1, 1972, as was the first river ever designated as a "national river", a designation that protects natural rivers from dams, empoundments and other obstructions that change the character of the river and disrupt the natural land and water life that flourishes there. C & H will inevitably change the character of the river and the water life that flourishes there. This was a Congressional Act and should be respected as such for future generations to enjoy the river. It should not be ignored for one factory farm, a privately held Ag Company, Cargill, worth billions of dollars, or the Small Business Associations poor judgement to engage in such environmentally risky loans. Certainly the public should not be subject to

environmental damage, reduced quality of life and risk to livelihood from the hog factory and then be expected to guarantee the loans that made C & H possible.

I object to the listing of many whose research is selectively used to produce a flawed EA. On page 5-1,5 Consultation, Coordination and Preparers, gives the impression that these folks listed had fully consulted on this EA. It is misleading, unprofessional, unethical and not a true representation of the level of involvement of many of the individuals and agencies listed as participants. The EA downplays that the farm and spray fields are located on karst and is just one example of omissions of important facts that invalidate the findings of the study.

This assessment cherry-picks data which supports its no-impact conclusions while ignoring contradictory information, The Big Creek Research and Extension Team(BCRET) is claimed to be "the best available scientific information", yet the assessment selectively ignores BCRET data indicating possible contamination of well water, ground water and Big Creek, and the presence of porous karst subsurface features. Most glaringly, it ignores extensive scientific data from other sources, such as NPS, Dr Van Brahana and other experts in the field, data which strongly suggest that C&H is indeed potentially

impacting surface and groundwater including both Big Creek and the Buffalo River. This assessment barely gives a passing glance at potential environmental impacts, much less take the "hard look" required by the court."

My comment is sent with great concern for the future and the ability of any EA of C& H to assure that this hog factory can exist in the Buffalo National River Watershed without degradation to the waters of Arkansas. The Arkansas Department of Environmental Quality (ADEQ) has designated the Buffalo River an "Extraordinary Resource Water" and a Natural and Scenic Waterway, the highest water quality designation given by the state. This large hog operation spreading millions of gallons of untreated raw animal waste in karst topography near Big Creek and the Buffalo National River will most definitely degrade the water quality. E Coli measurements already indicate this is happening. Allowing this hog factory to continue is unconscionable and to expect the taxpayers to be liable for possible default on millions of dollars in loans is unreasonable and unfair to the public.

Susan Watkins  
HCR 72 Box 34  
Parthenon, AR 72666