

January 15, 2016

The following are general comments provided for use by supporters who have requested guidance in commenting on the draft final EA. Read the draft final EA here:  
[http://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdfiles/Environmental/fonsi\\_hog\\_farms\\_final\\_assesment.pdf](http://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdfiles/Environmental/fonsi_hog_farms_final_assesment.pdf)

The Bottom line- we believe there is sufficient risk that environmental damage may or will occur and therefore a full Environmental Impact Statement should be undertaken.

BRWA is preparing more detailed and substantive comments which will be posted as soon as complete. Meantime we make these general comments available as an outline for preparing comments of your own.

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The draft final Environmental Assessment (EA) is open for public comment until January 29th. We urge supporters to submit comments to: C&H Hog Farms EA, c/o Cardno, Inc., 501 Butler Farm Road, Suite H, Hampton, VA 23666; and by email at:[CHHogFarmComments@cardno-gs.com](mailto:CHHogFarmComments@cardno-gs.com).

BRWA's position is that a "Finding of No Significant Impact (FONSI) is a flawed conclusion and that a full Environmental Impact Statement should be required because:

- The (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 and FONSI go to great lengths to deny the existence of karst geology under the farm, while 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.

- The EA and FONSI rely heavily on the 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.

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