Good evening. Thank you for holding this hearing and allowing the public to provide feedback on this permit.

My name is Kemp Burdette, I am the Cape Fear Riverkeeper and I represent thousands of our constituents, who live in the Cape Fear River Basin. I am also a resident of Pender County which shares a border with both Duplin and Sampson Counties – where this project is planned. There are three Smithfield hog farms within 3 miles of my home.

Over the last ten years my organization has taken hundreds of water samples in creeks that receive runoff from swine CAFO sprayfields. More often than not, those samples exceed the safe level of fecal coliform bacteria set by the state and the safe level of E. coli bacteria used by most other states. We have taken many water samples that were THOUSANDS of times higher than those safe limits. We recently sampled streams in the area of the proposed project and found E. coli levels more than a hundred times higher than what the EPA considers safe.

The lagoon and sprayfield system, which this project will rely on to function, is without a doubt the leading threat to the water quality of the Cape Fear Basin. The only way to prevent the further degradation of water quality in the Cape Fear River Basin is to do what the industry promised to do over twenty years ago – that is to end the lagoon and sprayfield system.

This project will do the opposite. By permitting this biogas project, North Carolina would further entrench a system that is widely understood to be broken and give yet another handout to factory farms. In fact, covered lagoons may actually make water quality impacts WORSE by concentrating nutrients in covered lagoons – which still need to be sprayed onto adjacent fields.

Furthermore, this project, like the thousands of CAFOs across North Carolina, will have a disproportionate negative impact on communities of color - who already get sick more often, stay sicker longer, and have shorter lifespans when compared to white residents BECAUSE of pollution from CAFOs.

Environmental Justice communities in Duplin and Sampson Counties already deal with the highest concentration of hog farms on planet Earth and a poultry industry whose explosive growth is centered in the same two counties. – AND COMPLETELY UNPERMITTED! They already have to deal with the slaughterhouses, rendering plants, feed mills, landfills and thousands of trucks full of animals and their waste. The stench of pig and chicken feces is not “the smell of money” as the industry loves to say. It is the smell of despair. A massive network of leaking pipelines, compressor stations, and an upgrading facility are the last thing citizens in Duplin and Sampson Counties need. This permit must consider these cumulative impacts if it has any hope of protecting Environmental Justice communities.

Finally, this permit lacks the transparency needed for communities and stakeholders to evaluate it. How can citizens understand the impacts of a project of this size when the permit doesn’t even disclose the locations of nineteen CAFOs that will feed gas to the upgrading facility? How can impacts of the network of pipelines be understood if their routes are not even detailed in the permit?

For these reasons I strongly urge the Division of Air Quality to deny this permit. Thank you.