



Division of Ecological & Water Resources
Region 4 (South Region)
21371 Highway 15 South
New Ulm, MN 56073

March 11, 2025

Minnesota Pollution Control Agency
c/o Megen Kabele
520 Lafayette Road
Saint Paul, Minnesota 55155

Subject: Lass Farms Feedlot Environmental Assessment Worksheet

Greetings,

Thank you for the opportunity to comment on the Lass Farms Feedlot environmental assessment worksheet (EAW). I have included my comments below for your consideration.

As noted in the Natural Heritage Review letter (ID# MCE-2024-00159), Rock River and its tributaries are home to the plains topminnow (*Fundulus sciadisus*) state-listed as threatened, and Topeka shiner (*Notropis topeka*) federally listed as endangered. Both species have specialized habitat requirements and are sensitive to nutrient and sediment loading. We support the incorporation of voluntary manure application best management practices (BMPs) for reducing nutrient loss identified in the EAW and the University of Minnesota Extension's [Tips for Fall Manure Application and How to Avoid Nutrient Loss](#). Given the proximity of manure application sites to Rock River and its tributaries and Minnesota Sites of Biodiversity Significance, it is highly recommended that these BMPs be strictly followed.

As a reminder, to ensure compliance with federal law, a federal regulatory review using the U.S Fish and Wildlife Service's (USFWS) online [Information for Planning and Consultation \(IPaC\) tool](#) should be conducted. Rock River and its tributaries are designated critical habitat for Topeka shiner, and the USFWS may have additional guidance and/or requirements.

Regards,

/s/ Haley Byron

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