

Jane Krentz

Comments re: Liberty Classical Academy Wastewater Permit:

Thank you for the opportunity to participate in the public hearing last night (Tuesday, May 13) regarding the draft permit for the proposed expansion of Liberty Classical Academy. I understand the limitations of the scope of your jurisdiction, but also have deep concerns. While you have silos of jurisdiction and responsibility, the environment doesn't follow such arbitrary delineation. It's all connected.

I have serious concerns about future contamination due to chemicals either intentionally or unintentionally introduced to the ground or surface water by this system. The danger is exacerbated by the directly related concern of the proposed wells required to serve the scope of this ill-sited project.

We all remember the dreadful impact on White Bear Lake due to excessive draw down of the water tables, which were "approved" by the DNR and rebuffed by the courts. It is my understanding that there were to be no more wells of the scope of LCA's proposed usage within 5 miles of White Bear Lake. The site of the school (well, wastewater treatment facility, drain fields, and holding pond) are entirely within that 5-mile range.

<https://fmr.org/news/2017/09/08/whitebearlake-ruling>

<https://files.dnr.state.mn.us/waters/gwmp/wbl-analysis.pdf>

But, MPCA isn't allowed to look at that factor when approving a permit? If that's the case, then I would request a thorough EIS be completed by the EQB prior to any permit being issued by MPCA.

I was told that the DNR would not let the school install one large well, but the city of Hugo is allowing LCA to drill multiple smaller wells that may add up to a total water draw of one large well. If this is the case, total impact should be determined. That seems like a loophole/work-around to enable developers to circumvent the judge's ruling.

This entire situation is exacerbated by climate change. We've just seen a series of 90+ degree days in May, with almost no rain. As the existing and proposed wells rely more on draw down from the aquifer, it creates more risk of contamination for water quality that exceeds well beyond artificially imposed jurisdictional boundaries.

I am also upset about the strategy employed by LCA when May Township expressed concern that the school's plans were inconsistent with the rural nature and ordinances of May Township. LCA sued May Township for \$2 million dollars. With the threat of litigation the town board acquiesced, with slight modifications to the LCA proposal.

To quote a recent article in the May 9th Pioneer Press:

"The portion of the project in May Township now only involves a septic field and holding pond and no other facilities such as athletic fields, township officials say."

So, Hugo hosts the school and May Township gets the septic field? That seems rather symbolic. I would contend our entire community and environment is getting the proverbial "septic" treatment.

Please reject the permit and require a complete Environmental Impact Statement.

Thank you.

Sincerely,

Jane Krentz