

# Kally Goschke

This would be a monopoly that would alter the market and push out smaller dairies.

I request an extensive EIS and animal welfare issues investigation of current operation. It looks like they are not caring for current animals by the look of their calves especially, let alone thousands more!

I don't think we should be bearing the costs of this mega CAFO. Their manure plan is not adequate. I live near Minnesota River and can see the impacts of current nutrient load and hydrology.

Pomme de Terre River watershed.

This watershed already shows documented nutrient stress, including elevated nitrate levels in local surface waters and connected basins. Given these existing conditions, the proposal should be evaluated not in isolation, but in terms of cumulative nutrient loading.

## 1. Nitrate Loading and Existing Impairment

The addition of manure from a significantly expanded herd, applied across approximately 13,000 acres, will increase total nitrogen inputs in a watershed that is already exhibiting nitrate concerns. Even with best management practices, it is well established that a portion of applied nitrogen is not taken up by crops and is instead transported via leaching and runoff.

I request that MPCA require a quantitative cumulative nitrogen loading analysis demonstrating that this project will not worsen existing nitrate conditions in receiving waters.

## 2. Tile Drainage and Rapid Transport Pathways

The project area includes extensive subsurface tile drainage, which creates direct hydrologic pathways from fields to ditches and streams. This significantly reduces natural attenuation and increases nitrate delivery to surface waters.

I request that MPCA require specific analysis of tile-drain contributions to nitrate transport, rather than relying solely on general nutrient management assumptions.

## 3. Groundwater Protection

The region relies heavily on groundwater for drinking water. Land application of manure at this scale presents a risk of nitrate leaching to aquifers, particularly in vulnerable soils.

I request that MPCA require:

- \* Expanded groundwater monitoring wells in application areas

- \* A clear nitrate threshold response plan if levels increase

## 4. Manure Storage Risk and Extreme Weather

While the proposal includes lined manure storage basins, extreme precipitation events are increasing in frequency and intensity. Overflow or application during saturated conditions could result in significant nutrient releases.

I request evaluation of climate-adjusted storage capacity and land application timing safeguards.

## 5. Water Quantity Impacts

The proposed groundwater appropriation (over 200 million gallons annually) raises concerns about local aquifer drawdown and potential impacts to connected surface waters and wetlands.

I request a cumulative water balance analysis evaluating impacts to nearby water bodies and ecological systems.

#### 6. Anti-Degradation and Downstream Impacts

As the Minnesota River system is already impaired in many reaches, additional upstream nutrient loading may contribute to downstream degradation.

MPCA should evaluate this project under anti-degradation standards, ensuring it does not contribute to further impairment.

#### Conclusion

Given existing nitrate concerns in this watershed, approval of this expansion without robust, site-specific cumulative impact analysis would pose a significant risk to both surface water and groundwater quality. I urge MPCA to require additional study, monitoring, and enforceable safeguards before considering permit approval.

#### Manure volume:

18,855 cows would produce an estimated 285,000 gallons of manure every day — about 520,000 tons per year — nearly 40% of Morris's daily water use

#### Groundwater risks:

Potential contamination from manure storage and land application

#### Drinking water:

Increased nitrate levels that can threaten private wells and public health

#### Air quality:

Odor and emissions that affect the quality of life for nearby residents

#### Farm consolidation:

Pressure on small and mid-sized family farms and a continued "get big or get out" model

#### Cumulative impacts:

Multiple large CAFOs are concentrated in one region, with limited oversight

#### Market Saturation:

Mega-dairies like Riverview dominate the milk market, and expanding this facility would further flood it, making it even harder for small farms to survive