

## Maddie Brown

I am a concerned citizen from Southeast Minnesota. I appreciate the opportunity for public comment on this EAW for the West River Dairy Expansion. Based on the EAW, I see a clear obligation for MPCA to issue an EIS on this project.

The MPCA has the statutory obligation to issue an EIS in this instance. Minn. R. 4410.1700, subp. 1 states that the MPCA must order an EIS for projects that have the "potential for significant environmental effects." The criteria for significant environmental effects includes the cumulative potential effects (as stated in Subp. 7 of the same statute). Similar dairies of the proposed size (a combined total of 26,397 AU), have shown clear cumulative impacts to surrounding communities including groundwater nitrate contamination, odor issues, reduced air quality (particulate matter/ammonia), increased greenhouse gases, and increased water consumption. As it stands, the EAW does not provide sufficient information (as referred to in Subp. 2a) to fully quantify these likely impacts. Therefore West River Dairy Expansion clearly meets the criteria that mandates MPCA must issue an EIS.

Allowing the proposer to create the largest mega-dairy in Minnesota without the due diligence of an EIS would be an insult to family dairy farmers across the state who are struggling to survive while doing the right thing. In addition, by not issuing an EIS, the State risks allowing the proposer to pollute our waters at no cost to them, pushing the bill for cleanup onto future taxpayers. Dairies of the proposed size can pose an economic threat to family farms, a hazard to the health and wellbeing of rural communities, and can become a costly burden to taxpayers in the long run. Citizens deserve to understand the full risks of the project without the MPCA rubber stamping its approval.

I urge the MPCA to uphold their statutory obligation and issue an EIS on the proposed West River Dairy Expansion.