

Kim and Deborah K. Larson

Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, MN 55155  
ATTN: Charles Peterson

We find it disheartening that unjustified negative labeling in agriculture continues to be an applied tactic in the ongoing small vs big agricultural operations. Many of the comments written in opposition to this project are typical examples of trying to proclaim this farmer and employee owned dairy (no East/West Coast investments or Hedge funds whatsoever) as a “*factory farm*”. Furthermore, just because this dairy is larger than most, many want to automatically label it .... bad - in all categories.

Statistics indicate the current average dairy herd farm in Minnesota is inventoried at 275 milking cows. When our grandparents milked their typical 16 dairy cows in the 1940’s, alarmist of the day may have perceived dairy farms of 270+ cows with the following conjecturing “... *just seems unreasonably too large*”, and “... *couldn’t possibly be safe for the environment*”, and “... *would most certainly cross the line for animal welfare*”, and “... *we just don’t need any more cows*”, and finally “... *A dairy farm of 270+ cows can only be defined as a ... factory farm.*” All of these misconceptions about dairy herd size, whether 65 yrs ago or today, couldn’t be further from the truth.

What is true, is that Minnesota’s dairy farmers of today have more on the line than most, in making sure the environment around their farm is secure and protected, and the welfare of their cows is as humane and ethical as possible. Farmers and their families live in the immediate area of their farms. Nothing is more paramount to any farmer than a safe, abundant supply of water, as their families drink the water from the aquifers right beneath the land they farm. Equally, the welfare of their livestock is of principal importance to the security of their business. They know from experience that the best care they can provide to their livestock has proven to provide the best return to their family’s livelihood.

What is also true, is that everything constantly evolves. No more so than in all areas of production agriculture. “*Economies of scale*” is the term used to describe the most efficient size a business needs to reach for maximum competitiveness, in what-ever segment they’re competing in. It is most definitely played out in the following examples. The average MN farm acres in crop production in 1940 was 160 acres. The MN average today is 400+ and expected to double by 2040. Likewise, the increase in the average dairy herd size by 2040 will most definitely be bigger than the average of today, because nothing can be expected to stay constant. But, it would be unjustifiable to formulate a knee-jerk reaction that .... bigger is automatically bad.

There is no disputing the fact that questions rightfully can, and should be asked, in the focus of science. The current EAW review would be absolutely thorough enough to answer all realistic questions enough to support the project. The level of inquiries needed to initiate an EIS would rise to the review level required for a Boundary Waters copper mine or a mid-Minnesota nuclear power plant .... not a livestock farm producing milk.

Respectfully,

*Kim and Deborah K. Larson*

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Kandiyohi County

