

Heather Benson

When I look through the mandatory EIS categories found in Minnesota Administrative Rules 4410-4400, I find it almost laughable that I even need to write this comment to ask the MPCA to require this EIS. How could it possibly be that a facility housing 26,000+ animal units producing over 250,000 gallons of waste PER DAY, drawing over half a MILLION gallons of water from my local aquifer and covering a physical plant footprint of over 1 MILLION square feet not be required to submit a mandatory EIS?

When I look through that list of mandatory EIS triggers, I see many things that would worry me far less than an industrial dairy facility:

Subp. 11. Industrial, commercial, and institutional facilities.

A. For construction of a new or expansion of an existing warehousing or light industrial facility equal to or in excess of the following thresholds, expressed as gross floor space,

- (1) unincorporated area, 375,000 square feet;
- (2) third or fourth class city, 750,000 square feet;
- (3) second class city, 1,000,000 square feet;

Subp. 14. Residential development.

A. 100 or more unattached or 150 or more attached units in an unsewered unincorporated area or 400 unattached units or 600 attached units in a sewerred unincorporated area;

Subp. 15. Airport runway projects. For construction of a paved and lighted airport runway of 5,000 feet of length or greater

Subp. 22. Sports or entertainment facilities. For construction of a new outdoor sports or entertainment facility designed for or expected to accommodate a peak attendance of 20,000 or more persons or a new indoor sports or entertainment facility designed for or expected to accommodate a peak attendance of 30,000 or more persons, or the expansion of an existing facility by these amounts.

How could it possibly be that a sports stadium hosting 20,000 people (only 4,000 AUM FYI) only periodically need more environmental review than an industrial dairy holding 26,000 AUM 24/365? How can that be?

I am pro-farmer. I want Minnesota farmers to have the best chance to succeed in every way. But we need to recognize there is an important and fundamental difference between a local family farm that runs 223 cows (the average Minnesota dairy herd size) and 18,000. If a business wants to operate at an industrial scale, as Riverview does, then they need to be prepared to undergo industrial review. It is that simple. If you want to play with the big boys, then you need to play by big boy rules. This doesn't even mean anyone is trying to "stop" their business—it is simply Minnesota holding an industrial facility to the same laws and standards that other industrial businesses (and sports stadiums, ahem) must abide by.