

## Jerry Seibel

I attended the recent public hearing on the West River expansion permit and would like to submit the following public comment. At the outset, I should note that many of the comments at the hearing, although perhaps scripted, seem to accurately reflect the fact that Riverview is very generous and appears to be a good neighbor. While these are laudable attributes, it appears that they may not be very relevant to the environmental review that your permitting process contemplates.

It is my understanding that the proposed expansion would result in an approximate 200% increase in animal units at this one location. I may not be reading it correctly but it appears that there might be an allowable increase of up to 26000 animal units, which would be over a 300% increase. In either case, it would result in the largest feedlot in one location in Minnesota if not the country. It appears as if the proposal, from an environmental standpoint, is going where no man has gone before.

The thrust of my comment is that there needs to be a focus on the cumulative environmental effect of this proposal upon the entire geographic area. Although the proposed expansion is the largest feedlot in the geographic area, it is not the only feedlot in the area. Whether these are dairy, pig or cattle feedlots, they all have a potential environmental effect upon the air, soil and water. Additionally, these feedlots are not the only users of these resources. Area farms not associated with West River also apply either manure or fertilizer to virtually every field that is farmed in the area. Although this is anecdotal and not necessarily accurate, it appears that irrigation of cropland in the area has increased, placing a further strain on water resources. It seems incongruous that the cumulative effect of the largest feedlot expansion in the state, if not the nation, should not be more fully explored through utilization of an EIS or conditions on the permit approval mandating graduated expansion with follow up mandatory environmental assessment of the whole area.

I am fully aware that additional delay could have some economic impact upon Riverview. So would an environmental disaster. From the presentation at the public meeting, I am aware that the proposed application includes certain provisions designed to mitigate negative environmental impacts of the feedlot. I am not knowledgeable as to whether the mitigation efforts are state of the art, but I am assuming they probably are. However, state of the art does not equate to absolute certainty. Mistakes or failures still happen. Once a negative impact happens, you cannot put the toothpaste back in the tube or the poop back in the cows. I can't believe that the policy of the state of Minnesota is going to permit the largest feedlot expansion in a single geographic area without more fully exploring the already existing environmental condition of the area. I am not sufficiently knowledgeable whether it is more environmentally friendly to concentrate large feedlots in a single geographic area or to spread them out through the state, but I assume that MPCA staff has such requisite knowledge.

Thank you for the opportunity to comment and for your thoughtful approach to this issue.