

## Audrey Arner

I am writing to formally request that the MPCA mandate a full Environmental Impact Statement (EIS) for the proposed West River Dairy expansion. As the largest livestock operation in Minnesota's history, the cumulative environmental risks—specifically regarding Contaminants of Emerging Concern (CECs)—far exceed the scope of the current Environmental Assessment Worksheet (EAW).

The Minnesota Department of Health (MDH) and the MPCA classify hormones as CECs. MDH data indicates that these substances already affect 90% of tested Minnesota lakes, and a U.S. Geological Survey study found the Mississippi River in Minnesota has the highest rate of "feminized" fish--male fish that develop female characteristics, such as eggs in their testes. The cause is attributed to endocrine-disrupting chemicals (EDCs) that act as estrogens, causing sexual disruption.

The scale of the West River Dairy expansion poses the following significant risks:

- **Hormone Output:** Pregnant and lactating cows produce large amounts of estrogen and related hormones. An 18,000-cow herd produces approximately 15 pounds of estrogen daily. Hormones are potent in very small concentrations. In addition, large dairies routinely use synthetic hormones to maximize lactation and control the cows' reproductive cycles, which further increases this biological load.

- **Environmental Persistence:** Estrogens in dairy wastewater are notably persistent and often fail to biodegrade under the anaerobic conditions found in manure storage lagoons.

- **Public Health Implications:** These hormones bioaccumulate in the food chain. Human exposure through contaminated drinking water is linked to impaired fertility, developmental malformations, and hormone-sensitive cancers.

- **Private Wells:** Rural residents relying on private wells are particularly vulnerable. No one monitors our wells for safety, so the full financial and health burden of testing and harm falls directly on us. Most municipal systems are incapable of filtering out these contaminants, so well owners are particularly disadvantaged by lack of regulatory oversight to keep our water safe. We deserve better. Our state prides itself on its water, pure water at that. If our water is no longer drinkable because others have profited from making it so, regulation and justice must prevail. Having grown up along Shakopee Creek in the adjacent watershed to the proposed expansion, I have witnessed the degradation of local watersheds firsthand; the Shakopee is now a designated critical nutrient hotspot. Nearby is Dublin Dairy, one of Riverview LLP's 8000 cow dairies. Do we have CEC data for Shakopee Creek? A blueprint for protecting our water and preventing contamination may become apparent if we choose to look. Perhaps we have hardly begun to accurately assess the environmental impact of dairies of this size, placing them ahead of CEC data collection and the safety of our drinking water.

If this expansion is green-lighted, hormones and endocrine disruptors will enter our water system at an unprecedented scale, affecting us all. Along with raising already elevated levels of nitrogen, phosphorus, and E. coli, the West River Dairy expansion represents a permanent threat to regional water security. I urge the MPCA to require a comprehensive EIS to study these cumulative impacts.