

Aubree Derksen

I strongly challenge the wording on p.45 "the project was deemed to have no effect on the Whooping crane, monarch butterfly, rusty patched bumble bee and prairie bush-clover." That just sounds like lazy science. All the pieces of your project are interconnected and your job during environmental review is to show how they are interconnected and how to mitigate the risks and harms, particularly the harms that come from the thinking that part A over here has no effect on part C over here. First off, the timing of this public comment period being in March/April makes it difficult for citizen scientists to run over and count all the milkweed that is in fact growing in the area that the EAW claims it's not. The original letter itself was issued in February 2024, further contact was made during the winter of 2025 and 2026, all non-growing seasons. I can spot milkweed in the ditch going 70mph on the highway because I had a Monarch waystation before moving here and raised monarchs. Lone milkweed plants are still valuable and are in cases preferred because they're less likely to be targeted by predators than large clumps of milkweed. So an area like this project area that might have more scattered milkweed plants versus large clumps of it will still have an impact on the monarch, not no impact. Further, the biosolids used as waste management strategy do in fact have an impact on insects like monarchs (<https://pmc.ncbi.nlm.nih.gov/articles/PMC7468139/>, <https://www.sciencedirect.com/science/article/pii/S2405844023069967>) whose host plants are likely to be on the fringe of agricultural fields where biosolids are spread or are randomly growing in the midst of crops. There is messaging to encourage the growth of pollinator plants in the midst of crops rather than discourage it because pollination helps everyone out. Milkweed too is also considered a "weed" and is therefore targeted by herbicides which therefore affect the monarch as well since herbicides are a chemical found in biosolids. The chemicals in biosolids end up being ingested by the caterpillars and have an effect on the adult wingspan making the wingspan smaller. For monarchs this matters because the 4th generation that hatches in the fall is the generation that migrates and they are bigger because of the need to migrate. Size matters for species survival. Biosolids are laid in the fall and the timing of that fall spread matters for the larvae that would consume the plants that come in contact with those biosolids. Then you have to show in your plan with biosolids that you have taken into account the monarch butterfly and how your mitigation strategy prevents undue harm to this proposed threatened species. You cannot say "this project has no impact on Monarchs." There is a significant rule change coming down the line soon regarding the status of the Monarch caterpillar. It would probably be wise to wait for that rule change before moving forward to ensure no irreparable harm is coming to that species. That or I need assurances that this project will go the extra mile with all documentation and act as if the rule has already been adopted and Monarchs are officially classified as threatened.