



Minnesota Pollution Control Agency

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January 23, 2013

Mr. John P. Ringle
ESD Director
PO Box 3000, Cass County Courthouse
Walker, MN 56484

Re: Winnemucca Farms Cass County Potato Farm Environmental Assessment Worksheet

Dear Mr. Ringle:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Winnemucca Farms Cass County Potato Farm project (Project) located in Cass County, Minnesota. The Project consists of the conversion of 1,459 acres of commercial forest to irrigated agricultural land. Based on this review by Minnesota Pollution Control Agency (MPCA) staff, we believe that the information provided in the EAW is insufficient to fully identify and assess the environmental effects of the Project. Consequently, we respectfully recommend that Cass County either withdraw the EAW and re-notice an augmented version, or issue a positive declaration to prepare an Environmental Impact Statement (EIS) to provide more information and analysis. Nevertheless, in the interest of informing the ongoing environmental review of the Project, the following comments are provided for your consideration.

Water Use (Item 13)

- This section of the EAW states that irrigation wells have already been installed. According to Minn. R. 4410.3100, subp. 1, if an EAW is required, a project may not be started until completion of the environmental review process. It appears that the installation of the irrigation wells may not be consistent with the Environmental Quality Board rules.
- Information related to the potential impacts and mitigation to be afforded by the permitting of the irrigation wells appears to be generally lacking. If such information is available at this time it should have been summarized and presented in the EAW. If information is not currently available, it should be developed and incorporated into the environmental review.

Geologic Hazards and Soil Conditions (Item 19)

The EAW does not identify or discuss the use of pesticides or fungicides, or potential environmental effects resulting from pesticide or fungicide use, in potato production. In particular, the high likelihood of fungicide use for as long as this land is in potato production should be discussed at some level in several parts of this document in order for the EAW to be complete. The majority of all Minnesota potato farms use applications of fungicide and a high majority of these use chlorothalonil specifically. The application of chlorothalonil, presumably via crop dusting, should be a consideration when discussing, at a minimum, items 11, 17, 20, 23, or 30. Chlorothalonil is classified by the Environmental Protection Agency (EPA) as "very highly toxic" or "highly toxic" to aquatic invertebrates. The EPA Reregistration Eligibility Decision (RED) fact sheet also states that "Chlorothalonil can contaminate surface water via spray drift or through runoff and erosion. Chlorothalonil can be dissolved in runoff and adsorbed to sediment in the runoff." As this proposed agricultural site has both wetlands and a stream that drains to the Crow Wing River, the potential for surface and groundwater contamination resulting from the use of pesticides and fungicides should be addressed in this environmental review.

In addition, recent reports by numerous sources, including the University of Minnesota Extension Service, indicate that the combination of chlorothalonil and some of the chemicals that beekeepers use as miticides in their apiaries can dramatically increase the toxicity of both products, and contribute to the death of the hive: (<http://www.extension.org/pages/61004/miticide-and-fungicide-interactions>).

This possible connection has been observed by members of the North Central Beekeepers Association in Brainerd, Minnesota, where hive death occurred repeatedly in hives with comb that had elevated levels of chlorothalonil and chlorpyrifos. We believe that information and analysis regarding all possible fungicides and pesticides that are likely to be used as a result of this project, and potential environmental and human health hazards of each, must be addressed in the environmental review of this Project in order for it to meet the intended purpose of adequately informing future decision making and the public.

The failure to have addressed this very significant environmental impact potential renders this EAW ineffective as an assessment tool, and considerations should be given to either retracting and reissuing the document with this issue being more adequately addressed, or making a positive declaration requiring an Environmental Impact Statement for this proposal.

Cumulative Potential Effects (Item 29)

A cumulative potential effects analysis is applicable and must be conducted for the environmental review to be complete. This requires an analysis of specific projects that may interact with the proposed project in such a way as to cause cumulative impacts. The responsible governmental unit must inquire whether a proposed project, which may or may not individually have the potential to cause significant environmental effects, could have a significant effect when considered along with other projects that (1) are already in existence or planned for the future; (2) are located in the surrounding area; and (3) might reasonably be expected to affect the same natural resource(s). The cumulative potential effects assessment should:

- Consider *past projects, existing projects*, as well as anticipated *future projects* that have been planned or for which a 'basis of expectation has been laid' (future projects for which permit applications or EAWs have been submitted either at the state or local level, or projects for which plats have been approved on the local level may be considered to demonstrate the required basis of expectation).
- Consider a limited geographic area surrounding the project in which facilities may reasonably be expected to affect the same natural resource – for instance, a nearby lake – as the proposed project.

In completing this analysis, the responsible governmental unit must identify: a) the limited geographical area considered; b) any other projects as outlined above, (and explain how they were identified); c) the cumulative impacts that may occur as a result of interaction of the other project(s) with the proposed project; and d) the natural resource(s) affected and how it may be affected.

We appreciate the opportunity to review this project. If you have any questions concerning our review of this EAW, please contact me at 651-757-2508.

Sincerely,



Karen Kromar
Planner Principal
Environmental Review Unit
Resource Management and Assistance Division

KK:bt

cc: Craig Affeldt, MPCA, St. Paul
Reed Larson, MPCA, Brainerd
Scott Lucas, MPCA, Brainerd