

## List of Inaccuracies and Omissions in the Circle K EAW—New EAW Needed

The MPCA's EAW for the proposed Circle K hog feedlot in Zumbrota Township is incomplete and inaccurate. It got fundamental information wrong and does not reflect the true nature of the proposal. So far, citizens have only had the chance to provide comments on a document that is riddled with inaccuracies and omissions. Citizens should have the right to comment on an environmental review that thoroughly and accurately evaluates the potential impacts of the proposal.

It's not just the quantity of inaccuracies, but also their nature, that is concerning. The EAW missed homes, wells, and karst features near the proposed site. These are the fundamental areas an environmental review is required to address. Without this critical information, the public cannot have confidence in this document. The MPCA needs to do an accurate EAW with a new 30-day public comment period. This is the only way to move forward to ensure that this project undergoes a thorough, accurate, and fair environmental review.

The mistakes in the EAW include, but are not limited to:

- **Page 1: The address for the proposed facility is incorrect.** The project address is listed as Lake City, which is 20 miles from the actual proposed site. Many Zumbrota-area residents may have seen this address and assumed the proposed project was not in their community.
- **Page 3, 18: The dimensions for the barn are incorrect.**
- **Page 3: The dimensions of the manure pit are not listed.**
- **Page 4, 16: The number of homes is incorrect.** The EAW missed 4 homes within 1 mile of the proposed project. This is basic information that is readily available on a simple Google search. Information that should have been triple-checked appears to not have been checked at all.
- **Page 9: The karst description was incorrect and misleading.** The description on page 9 reads, "this evaluation found no karst features." However, the karst evaluation found one previously-mapped sinkhole and 6 other karst features within ½ mile of the proposed project.
- **Page 9, Attachment K: The karst evaluation was inaccurate.** The evaluation was missing sinkholes and other karst features that are visible and well-known amongst area residents. In an area that is rated as highly susceptible to groundwater pollution, an accurate and thorough karst evaluation is critical. After residents supplied the MPCA with this information, a second karst evaluation was done by the same company that was unable to identify large holes in the ground during the first evaluation. Citizens have not had the opportunity to comment on the new karst evaluation.
- **Page 11, 13: The storage capacity of the manure storage pit is incorrect.**
- **Page 16: The air quality modeling report was inaccurate.** This reports evaluates the amount of hydrogen sulfide that will be emitted by the proposed project. Hydrogen sulfide is a poisonous gas with proven negative health impacts. An accurate air quality modeling report is crucial to the health and safety of near-by residents. The report in the EAW:
  - Failed to include 2 homes within 1 mile
  - Did not include the animal mortality composting pit
  - Mapped the terrain for the area incorrectlyThe results of this study are invalid. A new air quality modeling report has been submitted, with higher levels of hydrogen sulfide emissions, but citizens have not had the opportunity to comment on this new information.
- **Page 21: The EAW missed 13 of 15 known wells within 1 mile of the proposed project.** Rural residents rely on their wells for drinking water. Again, the MPCA failed to do basic fact checking.