

Subject: Public Comment on the West River Dairy Expansion Project (Riverview, LLP)

To the Minnesota Pollution Control Agency,

I am writing to express my **serious concerns regarding the proposed West River Dairy expansion in Stevens County**. As this project would create a facility twice the size of any existing livestock operation in Minnesota, I strongly urge the MPCA to require a full Environmental Impact Statement (EIS) before proceeding with any permitting.

An operation of this magnitude—reaching over 26,000 animal units—is far outside the state’s historical “envelope of experience.” Proceeding with such an unprecedented expansion without the most rigorous level of review is a significant risk to our region.

My specific concerns include:

- **Scale and Precedent:** This facility would be nearly double the size of the next largest CAFO in Minnesota and 60 times the size of the average Minnesota dairy. This is a fundamentally new type of industrial operation that requires industrial-scale scrutiny.
- **Water Usage and Quality:** The proposal to pump 226 million gallons of water annually—nearly reaching the consumption levels of the entire City of Morris—poses a major threat to our local aquifers. Furthermore, the proximity to the Pomme de Terre River watershed and several protected wildlife areas makes the potential for pollution from the 250 million gallons of stored manure a critical concern.
- **Socio-Economic Impact:** Riverview already accounts for approximately one-third of the dairy cows in Minnesota. Allowing further consolidation at this scale is unhealthy for market competition and directly threatens the viability of small, family-run farms that are the backbone of our rural economy and culture.

Given the scale of this project and the potential for irreversible environmental and economic harm, a standard Environmental Assessment Worksheet (EAW) is insufficient. We must understand the full impact through an EIS before moving forward.

Thank you for your careful consideration of these comments.

Sincerely,

Nicholas Freitag McPhee
911 Nevada Avenue
Morris, MN 56267
9 April 2026