April 8, 2026

Minnesota Pollution Control Agency
c/o Charles Peterson
520 Lafayette Road North
Saint Paul, MN 55155

Re: Riverview Expansion and Request for EIS
Public Comments Submitted by Sonja Trom Eayrs, author, ***Dodge County, Incorporated: Big Ag and the Undoing of Rural America***

Dear Mr. Peterson and Members of the MPCA:

I submit the following comments in support of an environmental impact statement (EIS) for expansion and future development of large animal projects, such as the one proposed by Riverview Dairy.

I grew up on our family farm in Dodge County, Minnesota. I am an attorney in Minneapolis and am actively involved in the day-to-day operation of our family farm. My family has been on the frontlines for years fighting corporate agriculture and installation of industrial factory farms.

Today, our family farm is surrounded by 12 swine Confined Animal Feeding Operations (CAFOs), *aka* factory farms, housing an estimated 30,000 hogs in a 3-mile radius. These industrial factory farms collectively house an estimated 12,000 animal units. *See*, attached Animals to Animal Units Conversion, Iowa DNR 01/2021 (Number of head (30,000) times equivalency factor (.4) equals animal units (12,000)). Although area factory farms in a 3-mile radius *collectively exceed 12,000 animal units*, *every industrial operation cleverly escaped environmental review*. Every factory farm houses animals just shy of one thousand animal units—the threshold for even minimal environmental review.

My family has had a front row seat to the corporate takeover of rural America. Our story is captured in my book, ***Dodge County, Incorporated: Big Ag and the Undoing of Rural America*** (Univ. of Nebraska Press, Nov. 2024). *See*, https://sonjatromeayrs.com/ My book weaves together my family's struggles with the larger realities of corporate livestock production in the United States: the pollution, the waste, the metamorphosis of thriving, verdant countryside into bleak commercial zones.

In the comments below, I briefly address three topics, including: (1) Dangerous nitrate levels; (2) Corporate consolidation and the decline of rural America; and (3) Harassment on the prairie faced by my family and other frontline families fighting corporate agriculture.

Please incorporate my comments and the noted attachment in the public record.

Dangerous Nitrate Levels

According to EPA records, "The drinking water of millions of Americans living in or near farming communities across the country is contaminated by dangerous amounts of nitrates and coliform bacteria from fertilizer and manure widely used in agriculture." Private wells in farming communities are routinely found to have nitrate levels above the municipal drinking water safety threshold of ten parts per million. This high bar is based on when levels become potentially fatal to infants, but drinking water at even half this limit increases the risk for colon, kidney, ovarian, and bladder cancers; miscarriages; thyroid disease; and neural tube birth defects.

A 2017 report showed that samplings of private wells in Dodge County between 1995 and 2016 found that 21 percent of private wells contained nitrate "above background concentrations," and 7 percent contained nitrate above the legal drinking water limit of ten parts per million. The county acknowledged that contamination was more prevalent in areas of Dodge "with shallow soils over limestone and over sand aquifers." I'm baffled that even with this contamination data, the county continues to permit feedlots over karst. Residents of Berne in northern Dodge, where karst topography dominates, fought hard against the first large swine CAFO in 2006. The community lost that battle.

In the years that followed, my late husband's mother, Ruth, along with other Berne residents, watched as the nitrate levels in her private well shot up. Ruth encouraged family members to drink only bottled water at the farm. In the fall of 2013, she succumbed to cancer. For years, my husband's family participated in the state's nitrate-monitoring program and dutifully submitted water samples to the local environmental ser vices office in the spring and fall. The results were damning: nitrate levels regularly came back between twenty and twenty-seven milligrams per liter, or three times the municipal drinking limit. My husband's family spent several thousand dollars to install a reverse osmosis system that removes contaminants from the water.

While pigs in the Berne area's factory farms drink pristine water drawn from a well drilled 480 feet down through multiple layers of porous limestone to the Prairie du Chien aquifer, residents drink water filled with nitrate from the pigs' manure. Today, locals refer to County Road B, the main thoroughfare north of my husband's family farm, as "Cancer Road."

County Road B garnered international media attention following a 2023 news report that highlighted the nitrate contamination found in area water supplies. The reporter, Keith Schneider, spoke with four families who shared stories of twelve cancer cases and seven deaths concentrated along a short stretch of this single rural road. "Though the causes of the cancers are not proven, a key suspected culprit is believed to be the elevated levels of nitrates that have contaminated the drinking water for County Road B families," Schneider wrote.

Contaminants deriving from livestock manure are also found in public water systems. A 2020 study found that the drinking water of an estimated half million Minnesotans is drawn from groundwater with elevated nitrate levels, citing "fertilizer and manure that runs off from farm fields and seeps into groundwater" as the primary contamination source. In this and other ways, feedlot pollution is both a localized and a dispersed problem. Groundwater leaching impacts public water supplies in neighboring towns and cities, and pollution in local rivers and streams is an uncontained hazard.

Data from the EPA shows that as of 2018–19, 42 percent of the length of lakes and streams in the United States had elevated phosphorous levels, and 44 percent have elevated levels of nitrogen. The EPA attributes these elevated levels primarily to fertilizer and manure runoff. In Iowa, where hogs outnumber people by seven to one, well over half of all waterways are impaired. The widespread degradation of waterways not only impacts people's health, well-being, and leisure activities but also causes massive fish kills and contaminates the fish that we eat. This is, of course, only a broad summary of the impacts of concentrated livestock agriculture on wildlife and the health of ecological systems.

In 2019 the Minnesota Pollution Control Agency issued a report about pollution in the Minnesota River, which eventually flows to the Mississippi. The report identified livestock manure runoff as a primary culprit behind an emerging environmental emergency that, per local press coverage of the report, is "degrading our superstar Minnesota River to sewer status." Worryingly, while the report indicated that the area of southern Minnesota included in the study contains 135 federally defined CAFOs (those holding a thousand-plus AUs), it did not specify the locations or the sizes of these feedlots—information that the public deserves to know. It also acknowledged that "while a full accounting of the fate and transport of manure was not conducted for this project, it is clear that a large portion of it is ultimately applied to the land surface and therefore, this source is of significant concern." So the MPCA can identify the pollution and deduce that much of it derives from factory farm manure, but lacking oversight capabilities, the agency is unable to pinpoint the most serious offenders or hold them accountable if identified.

Another MPCA study concluded that in Minnesotan regions dominated by agricultural land, "just half or fewer" of the area lakes "do not fully support swimming" due to excessive

phosphorous levels, which are likewise caused in part by manure runoff. Our beloved Minnesota, the "Land of 10,000 Lakes," has become the land of 4,600 impaired waterways. The meatpacking and dairy industries use local rivers and streams as their own personal toilet.

Corporate Consolidation and the Decline of Rural America

The proliferation of industrialized livestock operations has significantly impacted rural farm communities in several states during the first decades of the twenty-first century, including Minnesota. The raw data tells the story well.

The EPA estimates there were more than 17,000 large CAFOs (buildings holding more than a thousand AUs) in 2012 compared to 6,600 in 1995. That's nearly a threefold increase in less than seventeen years. Looking at hogs specifically, the data coming from Iowa, the top hog-producing state, is alarming: CAFOs increased fivefold between 1990 and 2019, with 94 percent of this growth attributable to hog barns.

The straight line between this corporate consolidation and the extinction of independent farmers is easy to follow. Since the mid-1990s, 70 percent of hog farmers have gone out of business. The meatpacking conglomerates seized near-total market control, while their loyal contract farmers have captured an ever-dwindling proportion of profits. In the mid-1980s, thirty-seven cents of every dollar that Americans spent on food went back to farmers, but by 2019 that had decreased to fifteen cents of every dollar. More than half of all farmers have lost money every year since 2013.

Meanwhile, the corporate meatpackers enjoy profits of a previously unimagined scale. Smithfield Foods saw sales increase tenfold between 1990 and 2005 thanks largely to its corporate strategy of buying up competitors and then maneuvering to fix prices and cut off access to a competitive marketplace. In 2013, in what was the largest-ever Chinese acquisition of a U.S. company, the Chinese company WH Group gained control of Smithfield.

Looking at the bigger picture, consolidation is the norm across major agricultural commodity groups. Dairy, soybean seed, and corn seed are other commodities that swiftly consolidated during a similar time frame. Between the years 2005 and 2010, eighty thousand independent farms in the United States disappeared. Then between 2011 and 2018, an additional hundred thousand farms in the United States were lost. In 2019 a feature article in Time about that year's farm bankruptcy crisis put forth a chilling proposition: "Farmers have always talked of looming disaster, but the duration and severity of the current crisis suggests an alarming and once unthinkable possibility—that independent farming is no longer a viable livelihood."

What's so worrying about today's corporate ag economy is that as profits soar and corporations boast to shareholders about outputs and efficiencies, the entire system is a house of cards. The droughts and severe weather associated with climate change have pummeled crops. Trade wars

and unstable commodity prices continually stress the system. Thanks to short-sighted federal policies promulgated under pressure from Big Ag corporations, large farmers rely heavily on subsidies. During the agriculture crisis that former president Donald Trump's trade wars played a role in triggering, $16 billion in aid went to farmers, and 40 percent of farm income in 2018 derived from federal aid and insurance.

Farm subsidies have always been an important governmental tool for protecting producers and consumers from the inherent unpredictability of seasonal yields. Yet when subsidies are overused and funneled primarily to the wealthiest farm operations, the result is a highly unstable, top-heavy system that has no incentive to solve the pressing problems—such as climate change—that cause low and unpredictable yields.

As small farmers left the industry en masse, what has been the impact on rural communities and economies? One of the best efforts to probe this issue is Food & Water Watch's 2022 study of counties in Iowa that compares rural counties with high CAFO density to rural counties with both low CAFO density and more small farmers. The results show that between 1982 and 2017, personal income rose significantly in Iowa; even in the average rural county, income rose 41 percent. But in the top hog-producing counties, personal income fell by 8 percent. The report also found that while retail businesses in Iowa declined by a modest average of 2 percent across the state, counties with the highest CAFO concentration saw a decline of 33 percent.

Meanwhile, the study found that small, independent farms have the opposite impact: counties in Iowa with the highest proportion of small farmers actually experienced retail business growth, beating the state average. (The economic vitality of small farms reminds me that hogs used to be called "mortgage lifters" because raising a small number of hogs on a diversified farming operation brought in some extra cash.)

CAFO approval in Iowa is all but assured by a combination of lax regulatory procedures, county-level industry infiltration, and state and national lobbying efforts. In this system, 97 percent of requested CAFO permits in Iowa are approved. This overt friendliness to CAFOs is a main reason why Iowa produces more pork than any other state, surpassing Minnesota and North Carolina, which both have more regulations on the books. That's good for the meatpacking conglomerates but bad for the people of Iowa. In 2019 a senior official at the Iowa Farm Bureau predicted to ag journalist Austin Frerick that "most rural communities will soon disappear." Frerick observed that the official seemed "accepting of this fate, even a bit happy about it."

CAFO proliferation has disproportionally impacted communities of color and marginalized communities. African American, Hispanic, and Native American people are significantly more likely to live within three miles of a hog CAFO in North Carolina—a pattern that likely exists in other states as well. Writing for the Sustainable Development Law and Policy journal, attorney

Christine Ball-Blakely showed that communities lacking political power, resources, and education are targeted as sites for CAFO development. Targeted communities "lack the resources to leave compromised areas, where they are trapped by decreasing property values and a plummeting quality of life," Ball- Blakely wrote.

A CAFO's impact on property values depends on the size of the CAFO and whether the impacted property is downwind or upwind from the operation. The larger trend, however, is clear: factory farms cause surrounding property values to decline. A 2015 analysis of appraisal values estimated that properties within three miles of a CAFO lose 26 percent of their assessed value, and properties that are very close to a CAFO—within a quarter mile—lose as much as 88 percent of their value.

This impact has a devastating ripple effect in rural communities, where many farm families are asset rich but income poor. The notion of losing a home's value is so frightening that families are forced to choose between taking a "wait and see" approach or being proactive by selling their properties and moving away before a CAFO goes up. I've seen this happen time and again. I'm reminded of a small farmer and self-employed business owner in Goodhue County, Minnesota, whom I will call "Jack." I've contacted Jack several times regarding his community's resistance to area factory farms. Jack asked me to use a pseudonym, as he fears retaliation against his family and small business.

In 2015 he and his wife purchased a rural home on a few acres in Goodhue, an ag county adjacent to Dodge. Ten months after moving into the home with their children, they observed a hog CAFO going up nearby. They soon learned that while they were negotiating the purchase of their home, the Big Ag–friendly Goodhue County Planning Commission had approved the adjacent factory farm by a unanimous vote.

Jack also discovered that the previous owners, who had lived there for many years, were aware of the planned development. No law requires sellers to notify potential home buyers that a feedlot has been proposed or approved in the immediate area. The decision to cut and run before a CAFO is built and to not disclose such information—shuffling the property off to unwitting buyers—is yet another aspect of the factory farm takeover that corrodes social and community relationships.

After the facility went up and additional CAFO applications were submitted in Goodhue County, Jack joined with other neighbors to monitor the air quality near the border of the feedlot's property. The results showed concentrations of hydrogen sulfide far above state safety standards in the area near Jack's home. He is concerned for his kids, who frequently play outside.

Jack's family has been living in Goodhue County since the late 1800s. His father owns a small dairy operation nearby, but he's facing the decision to shut down. The operation is now surrounded by CAFOs, and the nitrate levels in his well have steadily increased. Soon he may be unable to give the water to his cattle.

The story of Jack's family is typical. In CAFO country, a small handful of feedlot operators profit, while their operations are under no legal obligation to abstain from rendering neighboring small farms inoperable and neighboring residences unlivable. Reflecting recently on his family's experience, Jack said, "The industry divides communities and divides families.

Harassment on the Prairie

My family has paid a significant price for speaking out against industrial agriculture—facing years of harassment and intimidation. Fresh bullet holes riddled the stop sign just a few feet from where my brother and I had been picking weeds. Constant garbage left in the roadside near our driveway, harassing phone calls, and nighttime intrusions remained a regular occurrence. False telephone calls to the Dodge County Sheriff's Office, not to report some infraction, but to put the heat on me personally and get me to shut up.

These are just a few examples among hundreds, perhaps thousands, of harassment, intimidation, and outright threats and violence among neighbors that have become all too common in farm country today. The vast majority of these incidents go unreported because the threats are effective. People decide to stay quiet when they realize that speaking against factory farms will put their jobs, businesses, and families at risk. Livestock operators make it very clear that one's position on the latest factory farm development is a purity test that measures the loyalty of the locals.

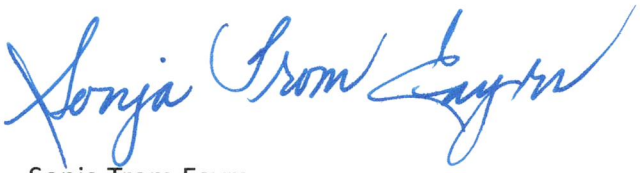
Dead animals left in mailboxes and on front stoops; death threats, raised rents, social ostracization; fires set in front yards; threats to local businesses; getting fired from your job—these experiences are common among rural residents who speak out against new CAFOs or proposed feedlot expansions. When choosing a site for a new CAFO, the industry targets remote rural areas often inhabited by poor or undereducated residents who are likely to either drink the industry Kool-Aid or lack the resources to effectively fight back. In an industry game of Whac-a-Mole, these isolated battles—strategically targeted in remote or impoverished locales—are part of a systematic strategy to permanently anchor the corporate Big Ag factory farm economy.

We need immediate action in Minnesota to address corporate livestock production and the resulting pollution and waste. It is incumbent upon the Minnesota Legislature to halt corporate consolidation and further decline of rural Minnesota. We also need stronger laws in place to

address and punish violators for intimidating and harassing frontline families fighting corporate agriculture, like mine.

Requiring an EIS for large animal projects, such as the proposed expansion of Riverview Dairy, is a start in the right direction. An EIS will limit the proliferation of large Confined Animal Feeding Operations (CAFOs), restrict further corporate consolidation, and prevent further decline in rural Minnesota.

Very truly yours,



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Animals to Animal Units Conversion

Animal Units are calculated using a factor which converts animals of different species or sizes into equivalent units. Animal units for each species can then be added together to determine the capacity of a facility. The animal unit capacity and type of operation determine which state or federal regulations apply to that operation.

To calculate Animal Units, use the table to multiply the number of animals of each species (column A) by the appropriate equivalency factor (column B) to determine the number of animal units (column C). **Note:** Use average weight during the production cycle to choose the appropriate animal species. Your number of head (column A) should be the maximum number of animals in each category that you would confine at any one time.

To calculate Total Animal Unit Capacity, add the animal units (column C) for each animal species.

Animals to Animal Units Conversion

Animal Species	A. Number of Head	X	B. Equivalency Factor	=	C. Animal Units
Slaughter or feeder cattle		X	1.0	=	0.00
Immature dairy cattle		X	1.0	=	0.00
Mature dairy cattle		X	1.4	=	0.00
Swine over 55 lbs.		X	0.4	=	0.00
Swine 15 to 55 lbs.		X	0.1	=	0.00
Sheep or lambs		X	0.1	=	0.00
Goats		X	0.1	=	0.00
Horses		X	2.0	=	0.00
Turkeys 7 lbs. or more		X	0.018	=	0.00
Turkeys less than 7 lbs.		X	0.0085	=	0.00
Broiler/layer chickens 3 lbs. or more		X	0.010	=	0.00
Broiler/layer chickens less than 3 lbs.		X	0.0025	=	0.00
Ducks		X	0.040	=	0.00
Fish 25 grams or more		X	0.001	=	0.00
Fish less than 25 grams		X	0.00006	=	0.00
Add all Animal Units in Column C to determine **Total Animal Unit Capacity**					0.00

Definitions:

Animal Capacity: the maximum number of animals which the owner or operator will confine in an animal feeding operation at any one time. In a confinement feeding operation, the animal capacity of all confinement buildings will be included in the determination of the animal capacity of the operation, unless the building has been abandoned in accordance with the definition of "abandoned confinement feeding operation structure."

Animal Unit Capacity: a measurement used to determine the maximum number of animal units that may be maintained as part of an animal feeding operation at any one time, including as provided in Iowa Code sections 459.201 and 459.301. For dry bedded confinement feeding operations, "animal unit capacity" means the maximum number of animal units which the owner or operator confines in a dry bedded confinement feeding operation at any one time, including the animal unit capacity of all dry bedded confinement feeding operation buildings that are used to house cattle or swine in the dry bedded confinement feeding operation.

CAUTION: This document is only a summary of administrative rules contained in 567 IAC chapter 65; it is a guidance document and should not be used as replacement for the administrative rules. While every effort has been made to assure the accuracy of this information, the administrative rules will prevail in the event of a conflict between this document and the administrative rules.