

Please submit to the Public Comment page:  
Comment to the MPCA for the Riverview Dairy Expansion  
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The proposed **significant expansion** of the existing Riverview Dairy, bringing the total number of cows to 18,855 (potentially raising the number of Animal Units to 26,397) requires a **significant environmental review** – a proper **Environmental Impact Statement**.

An **EIS** is the only way to insure that the people of Minnesota can be confident that this precedent-setting expansion can be thoroughly reviewed for the potential environmental impacts on our soil, air and waters, as well as the socio-economic impacts on our family-run small dairy farms, our rural communities and our Main Street businesses.

This mega-dairy concentrates too many cows, too much aquifer-drawn water, and too much manure to be permitted without the in-depth assessment process of an **EIS**.

**Too many cows** – there is much conversation about the use of electronic data gathering on individual cows and the enhanced genetics and robotic milking that occurs 3 times a day, however, it is disturbing that a dairy CAFO of this size requires a FACILITY 16: RENDERING DEPOT. That is not a facility necessary on the small family-run dairies where every cow gets looked at twice a day – or gets a seasonal break – where the family can provide the direct assessment of each cow's demeanor and health.

And what about the air quality for the families living within 1+ miles of this giant dairy? What will be the impact of the massive amount of manure produced every day at this Riverview expansion?

**Too much water** – Minnesotans can be sure that the 226 million gallons of water per year required for this expansion will have a significant impact on the health of the aquifer, which is also used for private wells & irrigations wells. There is no data on the MN Dept of Ag website about well testing in the townships of Stevens County, which means there is no base line information about the flow rate or recharge rates of the private wells that could be affected by the dairy's drawn-down of water – a draw-down which is equivalent, per year, of the water use of the entire city of Morris, 5000 people.

An **EIS** can be used to determine how this potential use of water by Riverview could impact other water users, an essential piece of information.

The **EIS** review can also examine how the cost of the DNR water permitting for the profit of this dairy expansion compares to the cost of water to the city of Morris, ultimately paid by its residents.

Ultimately who will bear the costs of Riverview's water use...could it be local residents, as happened with Riverview's mega-dairy in Arizona :

"Her office (Arizona Attorney General Kris Mayes) has entered an [agreement](#) with Riverview LLP, a Minnesota-based dairy company that moved into the area over the last decade and quickly became a major driver of the Willcox groundwater basin's decline. Under the agreement, the company is agreeing to reduce its groundwater usage by fallowing 2,000 acres of land and maintaining best practices to conserve water. The company also agreed to deliver \$11 million to residents affected by the company's overpumping that will pay to redrill wells, haul water and ensure the community has access to the critical resource. "

<https://insideclimatenews.org/news/10012026/arizona-agreement-with-dairy-farm-to-cut-groundwater-pumping/?emci=965383e4-2014-f1111-a69a-000d3a57593f&emdi=e81935b0-a116-f111-a69a-000d3a1f0a97&ceid=2641375>

**Too much manure** -- 18,855 cows will produce approximately **285,000 gallons per day** –for a total of **202,744,000 gallons per year**. Where will that manure go?? So far, the manure application maps show that all the fields included in the manure application plan are within one township – Synnes in Stevens County. There certainly is a problem with millions of gallons of manure application in such a small area – application that is limited by season, weather conditions and truck travel. How can it be possible to spread these millions of gallons of manure in a timely fashion? In appropriate ag rates? Who will supervise all that data? What will happen when adverse conditions require emergency drawdowns of manure in storage?

How many trucks will it take to haul all that manure? How many miles over township and county and state roads will that require? Who will pay those costs? Again, the folks who will profit from this operation will not bear the cost of road maintenance, nor the consequences of manure that must be spread unseasonably.

An **EIS** is required to answer these questions and to insure that all worst case scenarios can be mitigated.

Manure storage is a crap shoot – pardon the pun – and even if “covered” can pose serious health concerns to local residents. Lined concrete pits with covers have a certain half-life. “Concrete..., as told me by someone who actually builds manure pits, “ is new or it’s leaking.”

Noxious, toxic gases are produced in those storage pits and seep into the air – and charge into the surrounding air when the pits are stirred. Here's the problem...

“Manure pits that hold livestock and poultry waste give off foul-smelling toxic air pollutants that can be deadly to farmworkers and local residents, who often are powerless to defend the health of their families from the noxious emissions.”

<https://www.ewg.org/news-insights/news/manure-pits-emit-deadly-pollutants>

Having been part of a data-gathering group monitoring emissions from a local hog barn with a buried pit, I can, from experience, say with certainty that emissions occur. And in dairy barns they occur when barns and milking parlors are cleaned and manure moved to storage lagoons, where all those millions of gallons wait...

An **EIS** will give local folks a chance to understand the impact of the expansion on air quality and their health.

Too much manure spread in a small area also leads to water contamination, and with no baseline water testing in the townships of Stevens County and Synnes Township, in particular, local residents with private wells will have no baseline of nitrate testing to insure that their water is healthy to drink. It seems imperative that the MN Dept of Ag proceed with well testing and MPCA proceed with an **EIS**.

Benefits? Really? An EIS will tell.

The proposers suggest that there will be 40 jobs -- “40 families”-- coming with this expansion, but if you think about who really works on these CAFO sites, most are immigrant men, only a few of whom bring their families from their country of origin. These will not be farm families that can contribute to multiple local and Main Street businesses:

“...family-scale dairy farms can have a far larger positive economic impact in local communities. That’s because they support a broad network of local businesses, from veterinarians and feed suppliers to equipment dealers and milk haulers. When these farms disappear, those economic benefits are lost. Research shows that larger industrial-scale operations tend to spend less locally, concentrating economic activity rather than distributing it across rural communities.”

Land Stewardship Project Myth Buster, December 2019, “Myth: Mega-Dairies = Mega-Benefits for Rural Communities,”

[https://landstewardshipproject.org/repository/1/3116/myth\\_buster\\_56\\_mega\\_dairy.pdf](https://landstewardshipproject.org/repository/1/3116/myth_buster_56_mega_dairy.pdf)

And here’s something to think about... do we really want to be the home base to the 5<sup>th</sup> largest global dairy:

“Mega-scale dairy farms are primarily concentrated in [China](#), Saudi Arabia, Russia, the United States, and Southeast Asia. These regions combine access to capital, land, and regulatory frameworks that allow this model of scale.

Rank	Farm / Farm Group	Country	Raw milk production (t/year)
1	Mudanjiang Mega Dairy Farm	China	≈2,000,000
2	Almarai	Saudi Arabia	≈1,470,000
3	Modern Dairy	China	≈1,280,000
4	EkoNiva	Russia	≈1,200,000
5	Riverview LLP	USA	≈800,000–1,000,000
6	Rockview Family Farms	USA	≈1,000,000
7	Huishan Dairy	China	≈800,000
8	Al Safi Dairy Farm	Saudi Arabia	≈550,000
9	Greenfields Dairy Farm	Indonesia	≈400,000–450,000
10	Fair Oaks Farms	USA	≈350,000–400,000

**Why are European dairy farms absent from the global top 10 ranking?**

One outcome of this ranking is the absence of European Union dairy farms from the global Top-10. This is not due to missing data, but to structural differences in production models.

European dairy farming is dominated by family-owned farms, operating under strict environmental, animal-welfare, and land-use regulations. Scale is achieved primarily through cooperative aggregation, rather than through ultra-large, centrally owned farms. As a result, even Europe's largest individual farms fall well below the production thresholds required for inclusion in a global Top-10 ranking based on raw milk output per farm. Nonetheless, the EU's dairy sector is highly efficient and will be addressed in future articles."

<https://ruminants.ceva.pro/global-dairy-production>

Maybe we want to think about our first model – “family-owned farms... through cooperative aggregation” :

“In 1890, the Danish American community in Clarks Grove established one of the first cooperative creameries in Minnesota. The Clarks Grove Cooperative Creamery used new technology and a well-organized cooperative system. It became a model for the Minnesota dairy industry. Ten years later, there were more than 550 cooperative creameries in the state.”  
<https://www.minnpost.com/mnopedia/2015/06/banding-together-better-butter-clarks-grove-was-one-minnesota-s-first-cooperative-c/>

So many questions can be answered by an **EIS**.

So much more information can be gained by an **EIS**.

Clearly we need an **EIS** for this Riverview Dairy expansion proposal.

Thank you.  
Beth Slocum