Institute for Agriculture and Trade Policy (Ben Lilliston)

The Institute for Agriculture and Trade Policy thanks the Minnesota Pollution Control Agency for the opportunity to submit the attached comment on the proposed West Dairy Expansion. IATP believes that the proposed project should undergo a full Environmental Impact Statement (EIS). The expansion would make the dairy the largest in the state, by far. It is critical that we fully understand how the proposed project effects the environment, climate change, and the state's dairy farmers.

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Minnesota Pollution Control Agency
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The Institute for Agriculture and Trade Policy (IATP) is a 39-year-old, Minnesota-based non-profit organization that works for fair and sustainable food, farm, and trade policies. IATP has reported on, analyzed and commented on regulatory issues around concentrated animal feeding operations for more than 25 years.

IATP thanks the MPCA for the opportunity to submit comments on the proposed West River Dairy Expansion. This expansion would make West River Dairy (owned by Riverview Dairy LLP) the largest in the state by far. The expanded operation will house 18,855 dairy cattle, bringing the total animal units to 26,397 in one facility. Due to the size of the expansion (almost double the animal units of the next largest livestock operation) and expected effects on the water, sensitive ecosystems, and the state's climate goals, IATP urges the MPCA to require a full Environmental Impact Statement (EIS) so that the state and the public can fully understand the impact of this giant project. IATP also believes that the proposed expansion would have significant economic impacts for other dairy farmers in the state, particularly small and mid-sized dairy farmers. Those economic effects can only be fully understood through a comprehensive EIS.

With a project of this size, IATP believes a full EIS is necessary to better understand the project's potential impact in the following areas:

- Water use: The Environmental Assessment Worksheet (EAW) says the project will pump up to 226 million gallons of water per year from an off-site well.[1] This is an enormous new extraction of water. Riverview has had issues associated with over-pumping of water in the past. In Arizona, the company recently agreed to pay $11 million to residents after the dairy depleted a small town's groundwater.[2] In a 2025 report, the state's Department of Natural Resources raised concerns about the state's groundwater levels due to "demand for groundwater exceeding its recharge"

[1] https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid333/did200071/pid_213432/project-documents/20260202_EAW_WRDExp.pdf

[2] https://mcusercontent.com/cc1fad182b6d6f8b1e352e206/files/b0aaf293-9839-a6b7-4abb-e3a6e4121d71/Groundwater_Access_Settlement_Agreement_Arizona_Riverview.pdf

and "for increasing seasonally intensive groundwater use."[3] We need more details to ensure groundwater levels are protected in the context of this proposed project.

- Manure management: With the expansion, the operation will have liquid manure storage capacity of 250 million gallons of waste, with an estimated 14 months of holding capacity. This is an enormous amount of liquid manure to be storing, more than any operation in the state. Just last year a Riverview dairy experienced a manure spill in western Minnesota.[4] Most, if not all, of the manure application sites for this proposed expansion are within the Pomme de Terre River Watershed. Additionally, more information is needed on how digestate from the existing operation's anerobic digester will be handled in relation to the proposed expansion. Digestate is distinct from untreated manure and can pose additional risks to waterways through nitrate pollution.[5] Will the digestate be separated from manure storage built as part of the expansion and remain separated when sent to farmers to be applied to fields?
- Sensitive area protection: The proposed project would be located within a sensitive ecological region, vulnerable to additional pollution. The proposed dairy sits within five miles of eight different protected waterfowl and wildlife production areas and is part of the Pomme de Terre River watershed. As the EAW (p.24) states, "Three areas with permanent easements/public access were identified within approximately one mile of the Project: 1) Landers Waterfowl Production Area (WPA) southwest and upstream from the Project, 2) a Reinvest in Minnesota (RIM) easement with a portion in the Wetland Reserve Program (WRP) east and downstream from the Project, and 3) Alberta Wildlife Management Area (WMA) west and upstream from the Project." As the EAW states, there are several wetlands immediately south of the project site within the Landers WPA. Minnesota's just-finalized Climate Action Framework sets a priority to "protect, restore and manage peatlands and other wetlands."[6]
- Meeting the state's climate targets: Minnesota is currently off-track to reach its climate reduction targets, according to MPCA's latest data.[7] While sectors like

[3] https://www.eqb.state.mn.us/sites/eqb/files/appendix_c.pdf

[4] https://www.wctrib.com/news/local/dairy-near-pennock-minnesota-contains-manure-spillage-attributed-to-tank-failure

[5] https://doi.org/10.3390/agronomy13030626

[6] https://climate.state.mn.us/sites/climate-action/files/cc-mn4-04.pdf

[7] https://data.pca.state.mn.us/views/Greenhousegasemissionsdata/TotalGHGemissionsgoals?%3Aembed=y&%3AisGuestRedirectFromVizportal=y

transportation and energy have sharply reduced emissions, the agriculture sector's emissions have remained largely flat since 2005. Two major sources of the state's agricultural emissions are livestock (methane) and liquified manure (methane and nitrous oxide). The EAW (page 65) reports that this project will add an additional 1.99 million tons of carbon dioxide equivalent emissions over the life of the project (estimated at 30 years). While the EAW cites several strategies it could use to reduce emissions, none are required, nor do they come close to the enormous additional emissions this project will generate. MPCA must consider whether this project is consistent with the state's Climate Action Framework as well as the state's 2030 and 2050 climate targets.

- Climate change impacts on the project: Projects of this size, where a huge amount of liquid manure is stored, are vulnerable to extreme weather events such as torrential downpours and flooding. Expected rising temperatures associated with climate change can also affect animal health and reduce milk production (an issue not included within the EAW).[8] The EAW estimates an annual mortality rate of 500 cows and 225 calves. It is reasonable to assume those levels will rise as climate change increases temperatures and the spread of livestock disease.[9] The MPCA's March report to the state legislature on the costs of climate adaptation, highlights the need (and expected costs) for dairy farmers to mitigate the impact of rising temperatures on animal health and productivity.[10] While the developer has included some mitigation strategies, it is unlikely that climate challenges, including rising heat, will remain constant over time.
- Economic and competition impacts of the project: The EAW does not address the potential economic impacts to dairy farmers and rural communities from a project of this size. An EIS can include this critical analysis. IATP is concerned about the future of small and mid-sized dairy farms in Minnesota. In 1992, the state had 13,380 dairy farms, according to the USDA Agriculture Census.[11] In March 2026, there are only 1,673, according to the Minnesota Department of Agriculture.[12] The introduction of large-scale dairies have flooded the regional market with milk,

[8] https://pmc.ncbi.nlm.nih.gov/articles/PMC11758294/

[9] https://pmc.ncbi.nlm.nih.gov/articles/PMC7539894/

[10] https://www.pca.state.mn.us/sites/default/files/lrcc-mn-1sy26.pdf

[11] https://data.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_1_State_Level/Minnesota/st27_1_001_001.pdf

[12] https://www.mda.state.mn.us/minnesota-dairy-farm-activity-report#:~:text=This%20report%20provides%20monthly%20updates,number%20of%20dairy%20farm%20permits.

making it difficult for mid and small-sized dairies to continue. We urge the MPCA to consider the particular risks a dairy of this size poses to the state's dairy farmers, dairy workers and rural communities.

For these reasons, IATP believes an EIS is necessary for this project. An EIS will fully analyze the proposal's impact on water quality and quantity, climate change, and existing family dairy farms.

Thank you for considering these comments and we look forward to MPCA's response.