Wesley Sisson

I submit the following public comment regarding the proposed expansion of the West River Dairy operation. As a citizen concerned with environmental stewardship and the long-term sustainability of Minnesota's natural resources, I urge the MPCA to carefully scrutinize this proposal and consider the substantial risks associated with creating what would become the largest concentrated animal feeding operation (CAFO) in the state.

Large-scale CAFOs pose significant environmental challenges, particularly in regions where groundwater, surface water, and rural community health are closely interconnected. The proposed scale of the West River Dairy expansion raises several concerns that warrant heightened regulatory review and public transparency.

First, manure management at this scale presents a serious risk to water quality. With thousands of dairy cattle producing millions of gallons of manure annually, the potential for nutrient runoff, nitrate contamination, and phosphorus loading into nearby waterways increases dramatically. Minnesota has already experienced widespread nitrate contamination in groundwater and harmful algal blooms in lakes and rivers due to agricultural runoff. Expanding the state's largest CAFO could exacerbate these existing challenges, if manure storage, land application, and monitoring systems fail or are overwhelmed.

Second, groundwater protection must be a central consideration. Much of rural Minnesota relies on shallow aquifers for drinking water. Studies across the Midwest have demonstrated that large livestock operations can contribute to nitrate contamination of groundwater through manure seepage, over-application on fields, or extreme weather events. As climate change increases the frequency of heavy rainfall and flooding, manure lagoons and storage systems face greater risks of overflow or leakage.

Third, the cumulative environmental impact of such a large operation must be evaluated, not merely the direct facility footprint. The transportation of feed, manure spreading over wide land areas, increased truck traffic, and air emissions which include ammonia and methane can affect surrounding ecosystems and nearby residents. Air quality impacts, odors, and particulate matter are well-documented concerns associated with high-density livestock operations.

Fourth, the scale of this proposal raises broader questions about agricultural sustainability in Minnesota. While dairy farming is an important part of the state's rural economy, the consolidation of livestock into extremely large operations can create environmental risks that smaller-scale systems distribute more sustainably across the landscape. The MPCA has a responsibility to ensure that economic development does not come at the expense of Minnesota's water, soil, and public health.

For these reasons, I respectfully request that the MPCA:
1. Conduct a thorough and transparent environmental review of the proposed expansion.
2. Require rigorous groundwater monitoring and publicly accessible reporting.
3. Ensure that manure management plans account for extreme weather events and long-term soil nutrient loading.
4. Evaluate cumulative environmental impacts, including air emissions and watershed-level nutrient

pollution.
5. Provide meaningful opportunities for public participation and community input before any final approval.

Minnesota's lakes, rivers, and groundwater are among the state's most valuable natural assets. Decisions regarding large-scale agricultural developments must reflect a precautionary approach that protects these resources for future generations.

Thank you for considering these comments.

Respectfully submitted,