



May 7, 2026

Commissioner Katrina Kessler
Minnesota Pollution Control Agency
520 Lafayette Rd N
St. Paul, MN 55155

Public Comment: Riverview LLP – West River Dairy Expansion EAW

Dear Commissioner Kessler:

On behalf of Minnesota Famers Union (MFU) and responding to a vote from our Full Board, I write to request that you require an Economic Impact Statement (EIS) for Riverview LLP's permit to expand their West River Dairy in Stevens County. This scale of expansion is unprecedented in our state and we believe strongly that Minnesotans deserve a fuller examination of its environmental, economic, and social consequences.

MFU is a grassroots organization that has represented Minnesota's family farmers, ranchers and rural communities since 1918. Our membership and our Full Board include family dairies, including many who are struggling to stay in business while they shoulder prices below their cost of production. This challenge is not new with the number of Minnesota dairies declining by nearly half in the last decade, dropping from 3,470 in 2016¹ to just 1,600 farms today.² And while farms are declining, cows are consolidating into fewer operations. This one company is permitted for nearly a third of Minnesota's dairy herd.³

This consolidation has consequences not just for those families, but also for rural schools, small businesses, veterinary practices, churches, and other institutions that make life possible in rural Minnesota. According to an analysis from 2020, the average Minnesota dairy generates \$1.6 million in economic activity.⁴ A more complete analysis of the economic and social consequences of this project is needed.

Beyond that, we believe there are important environmental concerns that an EIS would more fully address. Our members understand that livestock projects draw water year-round and we want to

¹ Minnesota Dairy Industry Profile. Minnesota Department of Agriculture, 2016.
<https://www.mda.state.mn.us/sites/default/files/inline-files/dairyindprofile.pdf>.

² Dairy Industry Consolidates. Dairy Star, 2026. <https://dairystar.com/stories/dairy-industry-consolidates,30685?>

³ Proposed dairy in Morris would become Minnesota's largest feedlot. Star Tribune, March 16, 2026.
<https://www.startribune.com/proposed-dairy-in-morris-would-become-minnesotas-largest-feedlot/601596774>.

⁴ The Role of Dairy Farmers In Minnesota's Rural Economy. University of Minnesota Extension, June 9, 2020.
<https://conservancy.umn.edu/server/api/core/bitstreams/8b58793b-073e-4c43-81fd-96e0ffe1d172/content>.

ensure that we are stewarding this shared resource and safeguarding sufficient supply for neighboring farms. We also understand that consolidating livestock increases the potential consequences of a natural disaster, zoonotic disease, or human disease affecting workers.

To close, this project is different than those that are approved through our existing processes. From my memory of that time, when we established our current regulatory framework for feedlots in the late 1990s no-one contemplated a nearly 19,000 cow dairy operation. That is more than 60 times the average size herd in our state.

This project is different and deserves distinct consideration and the full public comment afforded by an EIS. If you have any questions, please contact our Government Relations Director, Stu Lourey, at stu@mfu.org or (320) 232-2047. Thank you for considering the needs and perspectives of Minnesota's farm families.

Sincerely,

A handwritten signature in black ink that reads "Gary Wertish". The signature is written in a cursive style with a large, prominent "G" and "W".

Gary Wertish
President, Minnesota Farmers Union