

Paul Moss

Please consider the following comments:

This proposed operation is the first of its size in Minnesota. It would be nearly double the size of the next largest operation in our state in terms of animal units. This makes it a fundamentally new and particularly powerful threat to Minnesota farmers and rural communities.

Minnesota is already losing dozens of dairy farms annually due to inconsistent and often below cost-of-production milk prices. Massive dairy operations, like the one Riverview is proposing to build, have glutted the market and tightened Big Milk's stranglehold on the industry, allowing them to push small and medium-sized family farms out of business and off the land. This operation would only exacerbate the situation and accelerate the loss of dairy farms in our state, decimating Main Street economies in the process.

No feedlot has ever undergone an Environmental Impact Statement (EIS) in Minnesota. Each time the MPCA has determined that an operation should undergo one, the operator that requested the permit has withdrawn their application. And all of those operations that were determined to need an EIS were significantly smaller than Riverview's proposed operation will be.

If built, the Riverview operation would be allowed to pump up to 226 million gallons of water per year from an off-site well. For reference, the City of Morris, which is home to over 5,000 people, is permitted to pump up to 300 million gallons of water a year. Once constructed, the facility would produce 202,744,000 gallons of liquid manure and wastewater a year and 26,400 tons of solid manure a year.

The Minnesota Department of Natural Resources has not yet completed a mapping of Stevens County's groundwater resources and aquifers for their County Geologic Atlas Series. In fact, they have not even begun the hydrological survey of the county. It is irresponsible to other water users and residents of the area to move forward with this permit without a full understanding of the potential impacts.

The Pomme de Terre watershed, where this expansion is proposed, is already considered a sensitive watershed. The MPCA already lists the two closest waterways to the facility, the Pomme de Terre River and an unnamed creek, as impaired, and this proposal would only exacerbate the impairment.

Thank you for your consideration.