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This expanded Riverview facility would be the first of its size in Minnesota, and more than 60 times the size of the average Minnesota dairy (fewer than 280 cows in 2025). This makes it a fundamentally new and particularly powerful threat to Minnesota farmers and rural communities.

The MPCA must recognize the fundamentally new nature of this threat and give this permit greater scrutiny than it ever has to previous proposals. This proposal by Riverview, LLP must be required to undergo a full Environmental Impact Statement.

An EIS will allow the proposal's negative impacts on water quality and quantity, local roads, and existing independent family dairy farms to be fully analyzed before the project is allowed to seek a permit.

Riverview has a recent history of manure spills in western Minnesota. In Arizona, the company recently agreed to pay \$11 million to residents affected by the dairy's overpumping. The proposed Stevens County site sits within five miles of eight different protected waterfowl and wildlife production areas and is part of the Pomme de Terre River watershed, just 25 miles from its confluence with the Minnesota River. A facility of this scale located in such a vulnerable area calls for a thorough environmental review.

Just as importantly, an EIS of the West River Dairy Expansion proposal would address socio-economic impacts. 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.

An industrial scale project needs industrial scale review. We need to make sure efforts to grow our economy are accountable to and support our farmers, our land, and our communities.