

I am submitting the following comments on the West River Dairy Expansion Environmental Assessment Worksheet as both a resident of Morris and a lifelong dairy farmer. I have read the complete EAW, attended the MPCA's public information meeting on April 27, 2026, and reviewed several of the comments that have been submitted.

After reading the EAW, I appreciated the thorough, project-specific data and research that were compiled. I also noted that the Feedlot EAW template was updated in December 2024 and is more detailed and comprehensive than previous versions of the worksheet. I have been following several recent MPCA reports related to feedlots, and I believe it is important that this project be evaluated within the framework of these broader policy developments.

### **Compatibility with Minnesota's 2025 Nutrient Reduction Strategy (NRS)**

Since 2014, many stakeholders—including the MPCA—have been working to improve water quality both locally and downstream. The 2025 Minnesota Nutrient Reduction Strategy (NRS) provides progress updates, establishes future goals, and outlines approaches for continued improvement. I would specifically like to highlight the following statement from page 158:

“For the 2025 NRS, these best practices were reconsidered based on updated science and an assessment of their effectiveness, their potential to affect large acreages, and the multiple benefits they provide.”

The West River Dairy Expansion incorporates three best practices identified in the NRS as having high total phosphorus (TP) reduction efficiencies.

#### **1. In-Field Nutrient Management**

Section 12.B.5.c.2 of the EAW identifies the use of precision knife-injection systems for liquid manure application. This practice is identified in the NRS as having a 35% TP reduction efficiency.

It is also important to recognize that the approximately 13,200 acres receiving annual manure application from West River Dairy will displace a comparable number of acres that are currently receiving commercial fertilizer. Manure application under this project will be closely regulated by the MPCA through a permit-required Nutrient Management Plan (NMP), including application rate limitations, timing restrictions, required setbacks from sensitive features, and mandatory cover crops or other best management practices (BMPs).

Commercial fertilizer sources, by comparison, are not typically subject to the same level of site-specific oversight. While I trust that farmers in my community are generally doing their best to responsibly manage fertilizer use, it should be acknowledged that fields receiving manure are among the most closely regulated agricultural fields in the area.

#### **2. Continuous Living Cover (Alfalfa and Cover Crops)**

Section 18.B.1 of the EAW describes that the project will generate demand for approximately 2,200 acres of alfalfa. As of 2022, “other crops and hay” accounted for roughly 7% of all crop sales in Stevens County (USDA). While alfalfa is currently a minority crop compared to grains and oilseeds, the addition of a dairy operation that provides a stable, local market will incentivize increased acres of alfalfa production.

Conservation crop rotations, including alfalfa, are estimated to provide a 30% TP reduction efficiency.

The Draft Feedlot Permit (Section 18.4) requires that manure land-applied from June through September, and potentially through October 14, have a cover crop established within 14 days of application. Section 12.B.5.a.2 of the EAW identifies September 1 through November 15 as the primary manure application period, and Section 6.F.3 states that 13,200 acres will receive manure annually.

Based on this timing and permit structure, approximately 60% of application acres will require cover crops—equating to roughly 8,000 acres of new cover crops planted annually. Cover crop implementation is estimated to provide a 29% TP reduction efficiency.

### **3. Drainage Water Recycling**

Section 12.B.4.b.5 of the EAW describes how the project will reduce sediment and nutrient runoff through stormwater pretreatment using sedimentation basins. The NRS estimates this practice has an 85% TP reduction efficiency.

In addition, Section 12.B.3.b of the EAW indicates that rainwater generated at the site will be captured and recycled for on-site use. This aligns well with the “multiple benefits” framework of drainage water recycling described in the NRS.

### **Cost and Public Benefit Considerations**

The NRS estimates on page 154 that statewide adoption of best practices could cost taxpayers between \$700 and \$850 million per year if fully publicly funded. The practices proposed as part of the West River Dairy Expansion require no public funding. As a Minnesota taxpayer, I value that these privately funded practices will provide public water-quality benefits both locally and downstream.

Similarly, the 2026 Minnesota Climate Action Framework identifies the following priorities (page 54):

- Increase soil organic carbon and reduce erosion
- Manage fertilizer and manure to reduce emissions
- Manage farmland for multiple benefits
- Improve climate resilience through multi-purpose water storage and management
- Develop markets for climate-benefiting products

The practices described above—precision nutrient management, continuous living cover, and drainage water recycling—align closely with these stated priorities with no direct cost to Minnesota’s taxpayers.

## **Context Within the Ongoing Feedlot Rulemaking Process**

The MPCA initiated updates to Minnesota Rules Chapter 7020 in March 2025. Approximately one year later, priority areas within the rulemaking scope were identified. While final rule adoption may take several more years, the West River Dairy Expansion appears positioned to meet or exceed the anticipated direction of the updated rules through requirements already included in the Draft Individual Feedlot Permit and practices described in the EAW. The relevant potential rules fell into 2 categories:

### **1. Land Application of Manure**

The following requirements are addressed under the Individual Feedlot Permit:

- Transferred manure provisions
- Nitrogen BMPs
- Manure Management Plan applicability
- Visual field monitoring
- Recordkeeping requirements
- Application rate and location restrictions dictated by the MMP
- Manure sampling requirements dictated by the MMP

Regional zoning requirements are still under development; however, the EAW does not identify the project or receiving fields as being located in vulnerable groundwater areas.

### **2. Technical Standards**

The Individual Feedlot Permit and EAW address the following technical standards:

- Manure storage capacity requirements
- Feed storage design and operation standards
- Livestock access to surface waters (not applicable, as this is a total confinement facility)
- Locational restrictions relative to sensitive areas (none identified)
- Enhanced manure storage design standards, including increased clay liner thickness and additional construction notifications

## **Presence of Existing Similar Operations**

The proposed expansion would result in the largest dairy operation in Minnesota, a fact that has been cited in calls for preparation of an Environmental Impact Statement (EIS). However, size alone does not equate to environmental impact.

I have visited dozens of dairies across the country for personal, academic, and professional reasons. In my experience, herd size is not correlated with either animal care or environmental performance. Smaller farms are not inherently “better,” nor are larger farms inherently “worse.”

Environmental outcomes are driven by the combination of regulatory standards and the integrity of ownership and management.

Minnesota has extensive regulatory requirements, as demonstrated by the hundreds of pages of documentation in this EAW, and is actively expanding oversight through rulemaking. The EAW did not identify any significant environmental impacts that would warrant preparation of an EIS.

Comparing similar projects does not fall within the formal scope of this EAW, but it seems relevant that comparable operations exist. The original West River Dairy, constructed in 2004, was one of the largest feedlots in the state at that time and has operated successfully and in compliance for over 20 years. This pattern has been repeated in other Riverview LLP dairy projects throughout Minnesota—large-scale facilities that have functioned with regulatory compliance and demonstrated environmental responsibility and operational integrity.

## **Conclusion**

Based on the information presented in the EAW and the Draft Feedlot Permit, the West River Dairy Expansion is consistent with Minnesota's published environmental initiatives, including the Nutrient Reduction Strategy, the 2026 Climate Action Framework, and the known scope of the Animal Feedlots Rulemaking process. The project proactively incorporates many of the practices that Minnesota's agricultural community and state agencies should be encouraging to improve water quality.

For these reasons, I urge acceptance of the EAW as published, without requiring preparation of an Environmental Impact Statement.

Thank you to the MPCA for your work both in reviewing this project and providing Minnesota with the framework to evaluate projects and work together to protect Minnesota's air, water, land, and climate.

## References

Minnesota Climate Change Subcabinet. (2026). Minnesota Climate Action Framework 2026 [PDF]. <https://climate.state.mn.us/sites/climate-action/files/cc-mn4-04.pdf>

Minnesota Pollution Control Agency. (2025). The first decade of the Minnesota Nutrient Reduction Strategy: 2014–2024 (Document No. wq-s1-87a) [PDF]. <https://www.pca.state.mn.us/sites/default/files/wq-s1-87a.pdf>

U.S. Department of Agriculture, National Agricultural Statistics Service. (2024). County profile: Stevens County, Minnesota (2022 Census of Agriculture) [PDF]. [https://data.nass.usda.gov/Publications/AgCensus/2022/Online\\_Resources/County\\_Profiles/Minnesota/cp27149.pdf](https://data.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/County_Profiles/Minnesota/cp27149.pdf)

U.S. Department of Agriculture, Natural Resources Conservation Service. (2026). Minnesota Nutrient Reduction Strategy (NRS) update: FY26 Minnesota State Technical Committee briefing [PDF]. <https://www.nrcs.usda.gov/sites/default/files/2026-04/MN%20STAC%20FY26%20Minnesota%20Nutrient%20Reduction%20Strategy%2028NRS%29%20Update.pdf>