

# Gary Dukes

To: Minnesota Pollution Control Agency (MPCA)

Date: May 6, 2026

Subject: Formal Opposition to the West River Dairy Expansion (Riverview LLP) and Petition for a Full Environmental Impact Statement (EIS)

I am writing to formally express my strong opposition to the proposed expansion of the West River Dairy facility near Morris, MN. This project, which seeks to increase capacity from 7,855 cows to 18,855 (totaling over 26,000 animal units), is unprecedented in the state of Minnesota. Given the massive scale and the history of this specific site, I urge the MPCA to deny the permit or, at minimum, require a comprehensive Environmental Impact Statement (EIS) before further consideration.

## 1. Water Quality and Watershed Impairment

The facility is located within the Pomme de Terre River watershed, a system already listed as impaired for bacteria and nutrients.

- **Waste Volume:** The expansion would result in approximately 250 million gallons of liquid manure storage. The risk of catastrophic failure or "allowable" seepage from clay-lined basins poses a permanent threat to local groundwater and the Pomme de Terre River, which flows into the Minnesota River.
- **Application Risks:** In a region prone to heavy spring rains, the saturation of phosphorus and nitrogen in the soil leads to inevitable runoff, worsening toxic algal blooms downstream.

## 2. Massive Groundwater Depletion

Riverview LLP has requested to pump 226 million gallons of water annually. Concentrated pumping of this magnitude threatens the domestic wells of neighbors and the long-term viability of the aquifer for the broader community.

## 3. Public Health

The emission of hydrogen sulfide, ammonia, and nitrous oxide (N<sub>2</sub>O) from a facility of nearly 19,000 cows is a significant public health hazard.

- **Respiratory Impact:** Neighbors are subjected to particulate matter and noxious gases that are linked to asthma, bronchitis, and other chronic respiratory conditions.
- **Climate Change:** N<sub>2</sub>O is a greenhouse gas roughly 300 times more potent than CO<sub>2</sub>. Permitting a single facility to emit such a concentrated volume contradicts Minnesota's stated climate goals.

## 4. Social Justice and Economic Disparity

The expansion of "Mega-Dairies" is not a neutral economic development; it is a driver of rural inequity.

- **Consolidation vs. Community:** By flooding the market with industrial-scale milk production, Riverview systematically pushes small- and mid-sized family farms out of business. This destroys the fabric of rural Stevens County, replacing independent business owners with a transient, low-wage labor model.
- **Environmental Justice:** Industrial CAFOs are consistently sited in rural areas where residents have fewer resources to fight protracted legal battles. This places the "negative externalities" of corporate profit—pollution, road damage, and smell directly onto the shoulders of local citizens while the

profits are exported.

- Lack of Oversight: In 2014, the MPCA Citizens' Board ordered an EIS for a much smaller version of this project. Since that board was abolished, the lack of a mandatory EIS for a project three times larger represents a failure of democratic oversight and a victory for corporate lobbying over public interest.

### Conclusion

The MPCA must recognize that the "West River Dairy Expansion" is not a standard agricultural project; it is an industrial experiment at a scale Minnesota has never seen. I urge that a full EIS be conducted to study the cumulative impacts on our water, our climate, and our rural social structure.

Sincerely,

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- Watershed Impairments: MPCA Pomme de Terre River Watershed Report
- MPCA Environmental Assessment Worksheet (EAW): MPCA Environmental Review Projects
- Minnesota EQB Monitor: EQB Monitor Archives
- MN DNR Permitting and Reporting System (MPARS): DNR Water Appropriation Permit Search
- City of Morris Water Usage: City of Morris Public Works - Water Reports
- Pomme de Terre River Impairments: MPCA Pomme de Terre River TMDL Report
- Regulatory History: EPA FOIA Records (Site Assessments)
- Rivera, J. E., & Chará, J. (2021). CH<sub>4</sub> and N<sub>2</sub>O emissions from cattle excreta: A review of main drivers and mitigation strategies in grazing systems. *Frontiers in Sustainable Food Systems*, 5. <https://doi.org/10.3389/fsufs.2021.657936>
- van der Weerden, T. J., Luo, J., Dexter, M., & Rutherford, A. J. (2014). Nitrous oxide, ammonia and methane emissions from dairy cow manure during storage and after application to pasture. *New Zealand Journal of Agricultural Research*, 57(4), 354-369. <https://doi.org/10.1080/00288233.2014.935447>
- PMC. (2026). Disparities in exposure to concentrated animal feeding operations (CAFOs) and other environmental justice variables. PubMed Central. <https://pmc.ncbi.nlm.nih.gov/articles/PMC12413751/>