

May 7, 2026

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

RE: West River Dairy Expansion -- Public Comment in Support of Permit Approval; No EIS Required

Dear Commissioner Kessler:

I grew up on a small farm in southwest Minnesota. Prior to joining Riverview, I spent my entire career in agricultural finance working with farm and agribusiness operations of every scale across the United States. I am also a Riverview employee and partner who came to this company because of its culture of opportunity. I want the record to reflect what that actually means: I am a farm kid who did not have a clear path back into production agriculture through my own family. I found that path at Riverview. And now my son is working here too. From the outside, people see a large dairy operation. From the inside, this is a story about what happens when passionate people who love agriculture are given an opportunity to build something together. That is the story this expansion is about.

I have reviewed a substantial amount of the comments submitted on this project and would like the MPCA to take note of something: the support record includes a substantial number of named local and regional businesses, contractors, equipment suppliers, ag lenders, and employers who have written substantively about the economic activity Riverview generates for them and their communities. Supporters also consistently speak to firsthand knowledge of Riverview's environmental stewardship, its nutrient management practices, its commitment to operating above minimum regulatory requirements, and its track record of compliance on this very site. The opposition contains virtually no businesses at all. The people with direct economic experience alongside this operation, and direct observation of how it operates on the ground, appear to overwhelmingly support it.

The MPCA is a science-based regulatory body. I am asking you to hold this comment record to that standard. What follows is my attempt to do the same.

Opposition comments suggest this project is somehow detrimental to Minnesota's farm economy. The record says otherwise. This project comes at a moment when the national dairy industry is signaling extraordinary confidence in future demand: U.S. dairy processors invested a record \$11 billion in new processing capacity between 2025 and 2028, per-capita dairy consumption reached a record 661 pounds per person in 2023, U.S. dairy exports continue to grow, and U.S. milk production is projected to grow by 15 billion pounds by 2030. The market is not asking whether dairy should grow. It is asking where. West River Dairy is part of that answer. The demand exists for farms of every scale that choose to meet it.

It is also worth discussing what "large" actually means in today's dairy industry. Virtually every new dairy built in the United States over the past ten years has been constructed at 5,000 to 12,000 cows or larger. West River Dairy's proposed scale is significant by Minnesota standards. By the standards of modern dairy investment nationally, it is competitive and rational.

In my work in agricultural finance, I have heard the same observation consistently from lenders, peer groups, and industry professionals across the country: Riverview is frequently cited as a model for people development, operational management, animal welfare, and environmental stewardship. Their facilities are among the most sought-after in the United States for industry tours. I share that not to advocate for the company that employs me, but because that external, unsolicited recognition from professionals who evaluate dairy operations for a living is relevant context for this permit decision. The existing West River Dairy site has operated at this location for years with a strong compliance record. This permit is not for an untested proposal. It is an expansion of something the record shows already works.

On environmental matters: first and foremost, managed manure application is not a threat. It is a tool. Under a nutrient management plan with soil testing, calculated application rates, and state oversight, it is agronomically sound practice that improves soil health, builds organic matter, and reduces dependence on synthetic inputs. Minnesota farmers have used manure as a fertility resource for generations, and the agricultural community broadly understands its value when managed properly. The permit conditions governing this operation require exactly that level of management. The concerns raised about runoff deserve to be evaluated against the actual permit requirements, not against a worst-case scenario untethered from how regulated operations work.

On the trajectory of agriculture broadly: tractors are larger and more capable. Genetics are more productive. Milking is automated and more frequent. These are not threats to agriculture. They are the result of American innovation, and they are the same forces that made Minnesota dairy competitive globally.

On water specifically: some opposition comments argue that Minnesota cow numbers have declined while simultaneously arguing that this operation uses too much water. Those two positions are in direct tension. If Minnesota still had the same total cow population distributed across thousands of smaller farms, system-wide water consumption would be comparable or higher. Consolidated operations are measurably more efficient on a per-cow and per-unit-of-output basis. That is not an assertion. It is an engineering and agronomic reality that the permit record supports.

The Environmental Assessment Worksheet for this project has been completed. An individual feedlot permit with specific, enforceable conditions will govern this operation. The categories of concern raised in opposition comments, water quality, manure management, stormwater design, and watershed protection, are all addressed within the existing regulatory framework. No commenter has identified a specific material question that the EAW failed to address and that only an EIS could answer.

One comment suggested that Riverview's resistance to an EIS implies something negative to find. That is an inversion of how permitting works in a system that must presume compliance with applicable laws, unless evidence suggests otherwise. The question is whether the existing process has left specific material questions unanswered. It has not. And the standard is whether there is the potential for significant environmental effects. There is not.

Applying a never-before-used standard to this operation would also send a signal to every agricultural investor considering Minnesota: that regulatory certainty here is conditional, and that scale alone is sufficient grounds for extraordinary review regardless of designs, plans, applicable

regulations, and compliance record. That signal would have consequences well beyond this permit decision.

There is something worth saying plainly at the close of this letter. Rural Minnesota is not dying because of farms like this one. Farms like West River Dairy are among the reasons rural Minnesota's future is bright. They bring jobs and families and economic activity that ripples outward through every business and institution in the region. They give farm kids another place to build a life in the communities they grew up in.

The factual record supports this permit. The EAW has been completed. The permit process is sufficient. The economic case is documented. The environmental concerns raised in public comments are addressed within the existing regulatory framework, and no specific gap has been identified that would require an EIS to fill.

I recognize that many people who submitted comments have genuine concerns about their community and their environment. Those concerns are valid and deserve a rigorous process. That process exists and has been followed here. What the concerns do not warrant is a heightened standard that the record does not justify.

I respectfully ask the MPCA to issue this permit. The existing review process is sufficient. An EIS is not warranted. This project, and the people whose futures depend on it, deserve the opportunity to move forward.

Respectfully submitted,

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