

Martha Koehl

I am one of the closest neighbors to West River Dairy, living in Horton Township just one mile from the proposed dairy expansion site. I grew up in Stevens County, and have lived here my entire life, having been a close neighbor to Riverview since 1995 when the first dairy was built. I have been part of the Riverview team for over a decade, choosing to return to my hometown after attending college out of state. Stevens County is a special place; made that way by the people that live here and the opportunities they've created through business and community growth to set current and future generations up for success.

Please see my attached comments on why the EAW shows that an additional EIS is not needed.

Public Comment in Support of the West River Dairy Expansion

Submitted to: Charles Peterson, MPCA Resource Management and Assistance Division

I am writing in support of the proposed West River Dairy Expansion in Synnes Township, Stevens County, and to respectfully urge the MPCA Commissioner to issue a negative declaration on the need for an Environmental Impact Statement. As both a neighbor living one mile from the facility and a member of the Riverview team, I can speak to the care with which this operation is managed and to the thoroughness of the environmental review that has been conducted. It is my considered view that the EAW adequately identifies and addresses the project's potential environmental effects and that an EIS is not warranted.

The EAW Is a Thorough and Sufficient Environmental Review

Under Minnesota Rules, an EIS is required only when a project has the potential for significant environmental effects that cannot be adequately anticipated, controlled, or mitigated through ongoing regulatory authority. The EAW before the Commissioner addresses every resource category required by Minnesota law and demonstrates, with supporting technical data, that each potential effect is localized, controllable, and well within existing state and federal regulatory limits. The document includes AERMOD dispersion modeling for air quality and odor, stormwater hydrology analyses, groundwater appropriation data, manure management acreage calculations, and cultural and natural resource reviews. These are not cursory treatments; they are detailed, conservative, and supported by professional engineering work. The EAW does precisely what Minnesota's environmental review program intends it to do: it lays out the facts and demonstrates that any potential effects from the project are mitigated and controlled and would not rise to the level of significance that would require further study.

Firsthand Observations as a Neighbor and Employee

I offer these comments as someone who has lived near Riverview's farms my entire life. I have personally observed the environmental practices that the EAW describes.

Manure management and nutrient planning. I have seen how carefully manure is handled at Riverview's farms. Application is done by knife injection at agronomic rates in accordance with

an MPCA-approved Manure Management Plan. Manure is sampled regularly, and application rates are watched carefully. Local farmers have made far more acres than required available for application, which provides a significant buffer and eliminates the need to apply on unsuitable fields or during winter months. These are not abstract commitments in a permit document; they are practices I have witnessed carried out year after year by people who take the stewardship of the land seriously.

Odor control. Riverview's use of impermeable synthetic covers on liquid manure storage areas, combined with knife injection during land application and consistent housekeeping practices, keeps odor well managed. The EAW's AERMOD modeling confirms what my own experience tells me: odor levels at neighboring residences remain below the state's faint-odor threshold. Living where I do, I would be among the first to know if that were not the case.

Water quality and wellhead protection. The EAW demonstrates that permanent stormwater basins, sized more than twenty percent above what is required for a 25-year storm event, will capture runoff and reduce both annual runoff volume and modeled erosion compared to the current row-crop condition. The liquid manure storage areas are constructed with clay liners that exceed the required minimum, perimeter drain tile for monitoring, and fourteen months of storage capacity rather than the required nine.

Economic Benefits to the Community

The expansion will create skilled local employment and generate sustained demand for crops grown by area farmers. It replaces a significant volume of synthetic fertilizer with manure-based fertility, reducing input costs for local farmers. Approximately 2,200 acres of row crops will be converted to alfalfa, which sequesters carbon and reduces tillage. These are real, measurable benefits to the rural Stevens County economy and to the farming landscape of this region.

Regulatory Authority Is Sufficient

The EAW identifies a comprehensive package of overlapping permits and approvals governing this project, including an MPCA Individual NPDES Feedlot Permit, a Construction Stormwater Permit, DNR Water Appropriation amendments, a DNR Dam Safety permit, a Stevens County Conditional Use Permit, and others. Each carries enforceable conditions, monitoring obligations, and inspection requirements. Riverview has operated the existing West River Dairy under these frameworks since receiving a negative declaration in 2003, compiling more than two decades of permit compliance. That record of compliance provides additional confidence that the regulatory structure is sufficient to address the expansion's environmental effects.

Conclusion

The West River Dairy Expansion EAW is a complete, well-documented, and thorough environmental review. It identifies the project's potential effects, quantifies them against applicable standards, and demonstrates that project design, mitigation measures, and existing permit programs reduce those effects to levels that are not significant. As a neighbor and team member who has seen Riverview's commitment to environmental responsibility firsthand, I respectfully urge the MPCA Commissioner to issue a negative declaration on the need for an EIS and to allow the project to proceed under its proposed permit conditions.

Respectfully submitted,

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