Nathan Hrnicek

I. Introduction and Basis for Comment

I am submitting these comments in strong support of the proposed West River Dairy Expansion in Stevens County, Minnesota. I offer this testimony as both a longstanding business partner of Riverview, LLP and as a dairy industry professional with extensive firsthand experience in nutrient management, advanced manure separation technology, and precision nutrient application systems across Minnesota and the broader Upper Midwest.

NutraDrip works directly with Riverview's operation as a trusted technology and agronomy partner. That working relationship has given me direct, sustained visibility into how this organization approaches environmental stewardship, nutrient management planning, and responsible growth. I do not submit these comments as a formality. I submit them because I have seen, firsthand, the operational discipline and environmental commitment that Riverview brings to everything they build — and I believe the proposed expansion to a combined 18,855 milking cows (26,397 AU) at West River Dairy represents exactly the kind of modern, accountable agricultural investment that Minnesota should be supporting.

II. The EAW Accurately Reflects a Well-Managed Operation

The Environmental Assessment Worksheet is an information-gathering tool — and the information it should reflect is this: Riverview, LLP has demonstrated, over years of operation, that large-scale dairy farming and responsible environmental stewardship are not in conflict. They are, in Riverview's case, inseparable.

The proposed expansion builds on an existing facility with established infrastructure, permitting history, and nutrient management systems already operating at scale. This is not a greenfield operation with untested management. Decision-makers reviewing this EAW should weigh heavily that the proposer has a proven track record managing one of Minnesota's most significant dairy operations — and has consistently done so in compliance with state environmental requirements.

III. Nutrient Management: Infrastructure and Technology That Match the Scale

The most consequential environmental consideration in any Animal Unit expansion is the management of increased manure volumes and the associated potential impacts on surface water, groundwater, and air quality. Based on my direct knowledge of Riverview's approach and systems, I am confident the proposed expansion can be managed without significant adverse environmental impact — provided the nutrient management infrastructure in place is accurately represented and enforced through permitting.

I would highlight the following specific strengths:

Advanced Manure Separation Systems

Riverview utilizes manure separation technology that meaningfully reduces the volume of liquid effluent requiring lagoon storage and land application, while concentrating nutrients into manageable solid fractions. At the scale of 26,397 AU, this is not a minor operational detail — it is a foundational risk-mitigation tool. Separation substantially lowers the risk profile for nutrient runoff, lagoon overflow, and excess loading to application fields. It also enables far more precise nutrient application by separating the liquid and solid fractions so each can be managed according to actual crop and soil need.

Precision Nutrient Application

As a partner in subsurface drip fertigation and precision nutrient delivery systems, I can speak directly to the practical and environmental advantage of applying separated manure fractions

through controlled, metered application systems. This approach dramatically reduces surface phosphorus and nitrogen loading, minimizes ammonia volatilization losses, and ensures that nutrients are placed where growing crops can utilize them efficiently — keeping them out of drainage tile outlets, ditches, and waterways. These are not theoretical benefits; they are measurable outcomes that distinguish operations like Riverview from legacy dairy operations that opponents of large dairy farms often reference.

Nutrient Management Planning (NMP) at Scale

Operations of this size in Minnesota operate under NPDES/SDS feedlot permits that require rigorous, maintained Nutrient Management Plans. Riverview's operational scale means their NMP is actively managed by professionals — nutrient management specialists, certified planners, and environmental consultants — not simply filed and forgotten. The land base required to support 26,397 AU under Minnesota's nutrient application standards is significant, and Riverview's history demonstrates they have assembled and managed that land base responsibly.

IV. Water Resource Protection

The EAW process rightly scrutinizes potential impacts to both surface water and groundwater resources. I offer the following observations based on industry expertise and operational familiarity:

Manure separation systems reduce hydraulic loading on lagoon infrastructure, lowering overflow risk during high-precipitation events — one of the most common pathways for nutrient impairment of surface water.

Precision subsurface application methods effectively eliminate the surface runoff pathways that would otherwise convey nitrogen and phosphorus to drainage ditches or surface water bodies.

Stevens County's agricultural soils and land base, when managed under a properly maintained NMP calibrated to realistic crop uptake and existing soil phosphorus indices, are well-suited to receive the nutrient outputs of an operation at this scale.

The expansion of an existing, permitted facility — rather than establishment of a new operation in an unpermitted location — provides regulators with an established baseline for monitoring, inspection, and enforcement.

I would encourage decision-makers and the RGU to ensure that the EAW reflects the specific separation, storage, and application technologies in use, as these are material factors in assessing actual environmental risk — and they distinguish this project favorably from generic large-feedlot assessments.

V. Economic and Community Context

While the EAW is an environmental review document, the decision-makers who rely on it should understand the full context of what is being proposed. West River Dairy and the Riverview family of operations are not simply large agricultural businesses — they are anchors of the Stevens County rural economy and examples of how agricultural investment, when done responsibly, sustains the communities, supply chains, and skilled workforces that rural Minnesota depends on.

Operations like Riverview create and sustain jobs in veterinary services, equipment, trucking, feed, agronomy, and processing. They support local tax bases. And they demonstrate that Minnesota can remain competitive in dairy production without sacrificing environmental standards — a balance that matters enormously to the long-term viability of agricultural communities across the state.

VI. Conclusion and Recommendation

Based on my direct professional experience with Riverview, LLP's operations and my expertise in

nutrient management and the dairy industry, I submit the following conclusions for the record:

The EAW adequately describes a project that can be permitted without significant adverse environmental impact, provided the nutrient management, manure handling, and land application systems described are accurately represented and enforced through the permitting process.
A full Environmental Impact Statement (EIS) is not warranted. The proposed expansion builds on an established, permitted, professionally managed facility with documented environmental compliance. The incremental increase in AU, when managed through Riverview's existing infrastructure and nutrient management framework, does not present the level of environmental uncertainty that would require an EIS.
Approval of this expansion supports Minnesota's agricultural economy and demonstrates that responsible large-scale dairy farming is achievable. I encourage the relevant agencies to move this project forward expeditiously.

I appreciate the opportunity to provide comment and am available to discuss any aspect of this letter in greater detail.
Respectfully submitted,
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NutraDrip