Margaret Kuchenreuther

I write to urge the MPCA to require Riverview LLC to complete an Environmental Impact Statement (EIS) before approving their proposed River West Dairy Expansion. This dairy operation, if approved, would be the largest feedlot in Minnesota and 500 times larger than the average dairy farm in Minnesota (Land Stewardship Project 2026). An agricultural operation of this unprecedented size deserves especially careful scrutiny in view of its potential to affect the economic, social and environmental conditions of both our local region, and potentially, the nation. Below are just a few of the reasons I believe an EIS is warranted before this project can move forward:

1. The most important reason to require an EIS is that the Environmental Assessment Worksheet (EAW) filed by Riverview considers only the environmental effects of this proposed dairy expansion. It is not designed to also incorporate analysis of the economic and social effects the expansion is likely to produce. The Land Stewardship Project (2026) recently produced a white paper that discusses dairy markets and the effects that production consolidation has on small operators. I find their analysis, echoed by a recent story in The New York Times (Saslow 2026), to be very concerning. Our current dairy market system is obviously broken, with production costs often exceeding earnings. Consolidating milk production in the hands of a few huge operators is unlikely help the prospects of small operators. Stressing the economics of small operators throughout Minnesota disrupts the lives of farm families and the economics of small towns, as well as leading to an epidemic of mental health issues and suicides among farmers (Rural Health Information Hub 2026). Only by requiring an EIS can the MPCA thoroughly investigate the important economic and social effects of this project.

2. Riverview's EAW acknowledges that ongoing climate change is expected to increase the frequency of heavy precipitation events, in addition to increasing average annual temperatures. They assert that building stormwater retention ponds that are 20% larger than that required to hold water from a 25-year precipitation event will be enough to reliably handle runoff from their impervious surfaces. However, I am not confident that this assertion is justified. The Minnesota Department of Natural Resources (2024) notes that heavy rainfall events are becoming more frequent in our state, meaning that "25-year" events may occur more often than historically expected. Given the current state of our climate and especially the changes expected in the coming decades (UMN Climate Adaptation Partnership 2026), I believe that, within the context of an EIS, Riverview should be expected to provide modeling of how well projected increases in precipitation (especially heavy rainfall events) would be handled by both their stormwater retention ponds and their manure storage facilities in order to prevent contamination of the Pomme de Terre River and adjacent wetlands.

3. Another important effect of climate change is the way that projected warmer and wetter springs (UMN Climate Adaptation Partnership 2026) will affect nutrient retention in fields after fall manure application. Historically, winters and springs were cold enough to keep most of the nitrogen from fall-applied manure in the soil profile. However, data show that unusually warm February and March temperatures (which are likely to become increasingly common in the future) can cause the loss of nearly all the nitrogen from a fall manure application, even if the manure is injected subsurface and treated with a nitrogen stabilizer (A & L Great Lakes Laboratories. 2026; Bayer Crop Science 2025.) Where will this nitrogen go? Into the Pomme de Terre River, of course, only

exacerbated by the ubiquity of pattern-tile drainage of fields in our region. Your own agency has documented that the middle and lower Pomme de Terre has experienced nitrate-nitrogen increases of 11% annually from 2007-20017, resulting in problems with dissolved oxygen and anthropogenic eutrophication (Minnesota Pollution Control Agency. 2024). Manure applications from an operation of this unprecedented size are likely to worsen the condition of the Pomme de Terre, despite the assurances offered in the EAW. And, unfortunately, the negative effects don't stop there. Nutrient pollution in tributaries of the Mississippi River annually causes a dead zone in the Gulf of Mexico (NOAA 2022), adversely affecting biodiversity in the Gulf, as well as the livelihoods of fisherman and those involved in the region's tourism industry. An EIS for this project should explore the likelihood of nitrogen loss from field applications of manure in the face of projected climate change.

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