

Joe Stroman

My name is Joe Stroman and I operate my family farm which is located 2 miles from the existing West River Facility. I am the 6th generation to live and work here, and 2026 marks 150 years of family ownership of our farm since it was homesteaded in 1876.

I am very familiar with Riverview's operation. I have family members who work for them. I have toured both their main barn and the West River barn. I've sold silage to them in the past and I've also worked on one of their silage harvesting crews. What people say is true: Their barns are clean and professionally run, and their employees all seem happy to work there.

That being said:

After reviewing the Environmental Assessment Worksheet, I believe there are some issues that need to be addressed.

My first issue of concern is wind erosion due to numerous consecutive corn silage crops. While documentation shows that runoff erosion is minimal, it seems that wind erosion is not being monitored. In fact, wind erosion isn't mentioned once in the entire EAW document. We have many days throughout the fall, winter and spring where the wind exceeds 30 mph and large amounts of topsoil can be observed blowing off of Riverview's silage fields while adjacent fields remain intact. Corn silage harvest removes at least 90% of above ground biomass, and even if the maximum rate of manure solids are applied afterwards and a cover crop is planted, it doesn't come close to replacing what was removed. Riverview usually grows silage corn for a number of years, followed by a perennial alfalfa crop as a resting period. This is described numerous times in the EAW as a "crop rotation". This is not a crop rotation, it is a decade-long alternation of two cash crops and a cover crop that never exceeds vegetative state. The continuous removal of biomass, followed by intensive tillage, plus a lack of biodiversity from consecutive corn crops results in a loss of soil structure and rapid degradation of the A-horizon. When topsoil blows off of fields it typically collects in road and drainage ditches. Numerous studies have been conducted where blown topsoil has been shown to have very high concentrations of nitrogen, phosphorous and potassium. Wind erosion potential of continuous silage ground and mitigation practices thereof is something that should be required in an Environmental Assessment Worksheet. If not, an Environmental Impact Statement should be required to determine the potential impacts of these practices.

Another concern that I have is the socioeconomic impact of an operation this size, which is not covered in the EAW, and is often ignored in public discourse. While Riverview does provide opportunities to other farmers in the form of buying silage and selling manure, many smaller farm operators within the West River Dairy footprint are of the opinion that Riverview's competitive presence in the local land market has caused a false inflation of land values. If Riverview is interested in a piece of farmland, they will pay top dollar, and landowners are aware of this fact. Most farmland tenants can't compete with Riverview's offers or bids if and when their rented ground comes up for sale, which decreases their acres of production, leading to a loss of opportunity for future generations to step into their family business. This has become very evident in the small communities surrounding Morris, who must work diligently to keep businesses and schools open in spite of a declining population. I am aware that the consolidation of agriculture in this area isn't solely caused by Riverview. However, observing many other rural communities where Riverview doesn't have a presence may lead one to believe that they are a catalyst. An

argument could be made that the West River Expansion already has a sufficient land base to operate with, and has no need to buy more land. That very well could be true, under the assumption that there will be no further expansions. Anyone who possesses the gift of hindsight can see how that plays out. In 2003, Riverview held a public meeting to discuss the proposed construction of the original West River Dairy facility, their second barn at the time. My father, Keith Stroman, stood up and asked why they were more than doubling the size of their dairy enterprise with the simple question: "Why are you doing it?" One of the owners responded, "It's for our kids." This was a good enough answer for Keith, as he was structuring his own farm operation so that I could someday step in. Fast forward 23 years, and they've built a dozen more barns just in the state of Minnesota alone. I'm not convinced that this is a one and done project, and I'm also not convinced that this is being done to safeguard job security for someone's kids.

I believe that Riverview has every right to do business in Stevens County, but when the industrial scale of their expansion has the potential to impact an entire community, there needs to be industrial scale accountability.

I've deliberated making this comment since the opening of the comment period, because I feel like it will put a target on my back. I know many other people who won't be making a comment or voicing their opinion because they fear social or professional repercussions. This ties back to the socioeconomic effects that I mentioned above.

In closing, I don't believe the Environmental Assessment Worksheet addresses all of the potential impacts of the proposed expansion, environmental or otherwise. Riverview has the personnel, resources and most of all, ambition to do their due diligence and complete an Environmental Impact Study.