

Erica Boyum

Dear Commissioner Kessler:

I am writing in strong 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. Both my husband and I grew up on dairy farms in Minnesota. We are passionate about agriculture, passionate about dairy, and passionate about building sustainable opportunities and livelihoods for generations to come. We are raising our family here, living right on the Pomme de Terre River, and we have found our personal and professional home with Riverview. I am the fourth generation in my family to work in dairy, and it is my sincere hope to pass that opportunity on to my children. Riverview has made that possible — and this expansion is part of that same story. Farming sustainably and responsibly is not an abstract value to me; it is a daily commitment. I truly believe that Riverview cares for people, animals, and the environment in the best way possible, and the record before the MPCA reflects that. The Environmental Assessment Worksheet is thorough, the permit structure is adequate, and an EIS is not warranted.

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 am writing in strong 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. Both my husband and I grew up on dairy farms in Minnesota. We are passionate about agriculture, passionate about dairy, and passionate about building sustainable opportunities and livelihoods for generations to come. We are raising our family here, living right on the Pomme de Terre River, and we have found our personal and professional home with Riverview. I am the fourth generation in my family to work in dairy, and it is my sincere hope to pass that opportunity on to my children. Riverview has made that possible — and this expansion is part of that same story. Farming sustainably and responsibly is not an abstract value to me; it is a daily commitment. I truly believe that Riverview cares for people, animals, and the environment in the best way possible, and the record before the MPCA reflects that. The Environmental Assessment Worksheet is thorough, the permit structure is adequate, and an EIS is not warranted.

The EAW Is Complete and Sufficient

Minnesota's environmental review program requires an EIS only when a project presents the potential for significant environmental effects that cannot be adequately anticipated, controlled, or mitigated through the existing regulatory framework. The EAW for this project does not leave that question open. It includes AERMOD dispersion modeling for air quality and odor, stormwater hydrology analyses sized more than twenty percent above the required 25-year storm event standard, groundwater appropriation data, manure management acreage calculations demonstrating more than sufficient application acres, and cultural and natural resource reviews. Each of these analyses is technical, conservative, and professionally prepared. Taken together, they demonstrate that the project's potential effects are localized, manageable, and well within applicable state and federal limits. The EAW does precisely what the statute intends it to do.

Environmental Stewardship Observed Firsthand

The environmental commitments in the EAW are not abstract. They describe practices I have observed carried out consistently over many years at this site. Manure is applied by knife injection at agronomic rates under an MPCA-approved Manure Management Plan, with regular sampling and careful attention to application timing and field conditions. Local cooperating landowners have made significantly more acreage available than regulations require, eliminating pressure to apply on marginal fields or during unsuitable conditions. Impermeable synthetic covers on liquid manure storage, combined with consistent land application practices, keep odor well controlled — and the EAW's AERMOD modeling confirms that odor levels at neighboring residences remain below the state's faint-odor threshold.

Stormwater and groundwater protections are similarly robust. Permanent stormwater basins are designed to reduce both annual runoff volume and modeled erosion below current row-crop conditions. Liquid manure storage areas are constructed with clay liners exceeding minimum requirements, perimeter drain tile for leak detection, and fourteen months of storage capacity compared to the required nine. These are not minimum-compliant designs. They reflect a genuine commitment to operating above the floor.

The Regulatory Framework Is Adequate

This project will be governed by a comprehensive and overlapping set of permits: an MPCA Individual NPDES Feedlot Permit, a Construction Stormwater Permit, DNR Water Appropriation amendments, a DNR Dam Safety permit, and a Stevens County Conditional Use Permit, among others. Each carries enforceable conditions, monitoring requirements, and inspection obligations. The existing West River Dairy has operated at this location for more than two decades under this same regulatory structure, with a consistent record of compliance. That track record is directly relevant. This is not a proposal from an untested operator. It is an expansion of a permitted operation whose compliance history provides genuine confidence that the framework is adequate to govern the expanded facility.

No commenter has identified a specific material question that the EAW failed to address and that only an EIS could answer. The standard for an EIS is not whether concerns have been raised in the public comment process; it is whether potential effects rise to the level of significance that existing regulation cannot adequately address. They do not.

A Community Investment Worth Supporting

The expansion will generate skilled local employment, create sustained demand for crops grown by area farmers, and convert approximately 2,200 acres from row crops to alfalfa — reducing tillage, sequestering carbon, and replacing synthetic fertilizer inputs with managed manure fertility. These are real and measurable benefits to the Stevens County economy and to the agricultural landscape of this region. West River Dairy is not a burden on this community. It is a reason this community continues to grow.

The EAW for the West River Dairy Expansion is thorough, well-documented, and sufficient. The permit conditions governing this project are enforceable and adequate. The operator's compliance record inspires confidence. And the community and economic benefits are documented and real.

I respectfully urge the MPCA Commissioner to issue a negative declaration on the need for an EIS and to allow this project to proceed under the proposed permit conditions. The record supports it, and the people of Stevens County deserve the opportunity it represents.

Respectfully submitted,

Erica Boyum