

## H2 Land Stewards (Dave Vipond)

Minnesota Pollution Control Agency (MPCA)

Dear MPCA Decision Makers,

On behalf of H2 Land Stewards, we respectfully submit this letter in support of the Riverview Farms West River Dairy Expansion.

H2 Land Stewards is a grassroots, nonprofit organization representing several hundred Minnesota residents, primarily landowners and agricultural producers. Our organization was established to educate members about their landowner rights and to protect those rights from erosion through unnecessary, inconsistent, or disproportionate government action. We strongly support regulatory processes that are fair, predictable, and grounded in sound science.

Riverview Farms has demonstrated a longstanding commitment to responsible land stewardship and proactive conservation practices. Environmental safeguards are already built into their existing systems and operational plans. These are established, proven practices that function as intended to protect soil and water resources. Riverview Farms has shown initiative by planning ahead and investing in systems that reduce risk and improve environmental protection, rather than relying on reactive measures.

While the proposed West River Dairy will be larger in scale than some other operations, it is not different in kind. The expansion does not introduce new practices, new risks, or fundamentally different impacts. The same conservation measures, best management practices, and regulatory oversight that apply to comparable dairy operations are already incorporated here. Size alone does not warrant treating this project differently from others that operate under the same established framework.

For these reasons, H2 Land Stewards does not believe a full Environmental Impact Statement (EIS) is justified. Existing environmental safeguards are already embedded in the system, and additional environmental review requirements would not meaningfully increase environmental protection. Instead, requiring an EIS based solely on scale risks creating regulatory inconsistency and setting a precedent that discourages responsible growth by landowners who are already operating within compliance.

Riverview Farms has approached this expansion transparently and in good faith, engaging with the permitting process and demonstrating a cooperative posture toward regulatory oversight. This proactive approach should be recognized and encouraged. Regulatory decisions should remain proportional to demonstrated environmental risk and based on actual operational differences—not assumptions tied to size alone.

H2 Land Stewards urges the MPCA to give the West River Dairy Expansion full and fair consideration and to recognize that responsible agricultural growth, supported by existing conservation systems, does not warrant unnecessary regulatory escalation.

Thank you for your time and consideration.

Respectfully,

H2 Land Stewards