



DEDICATED TO A STRONG GREATER MINNESOTA

February 7, 2025

VIA SmartComment

Commissioner Katrina Kessler
Minnesota Pollution Control Agency
520 Lafayette Road
Saint Paul, MN 55155
katrina.kessler@state.mn.us

RE: 2025-2027 Triennial Standards Review – Comments from the Coalition of Greater Minnesota Cities

On behalf of the Coalition of Greater Minnesota Cities (CGMC), I am writing to provide comments on the Minnesota Pollution Control Agency's ("MPCA" or the "agency") Triennial Standards Review. The CGMC is a group of more than 100 cities throughout the state dedicated to developing viable progressive communities for families and businesses through good local government and strong economic growth. We aim to ensure that water quality regulations are sensible, cost-effective, and result in meaningful environmental benefits.

Our member cities face increasing challenges in meeting regulatory requirements while maintaining critical infrastructure, especially with limited financial resources. We urge MPCA to prioritize water quality standards in its 2025-2027 work plan that directly impact human health and provide significant environmental benefits without imposing unnecessary costs on municipalities.

Lower Mississippi River Sulfate Site-Specific Standard – Wild Rice

The CGMC supports site-specific sulfate standards for the Lower Mississippi River, specifically for Pool 3 and Pools 4–8. MPCA's own data shows that wild rice has grown successfully in these waters for over 15 years, even with sulfate levels exceeding the 10 mg/L standard. A site-specific standard would better reflect actual conditions while preventing excessive financial burdens on municipalities. Applying the statewide 10 mg/L sulfate standard to these pools could impose costly and unnecessary treatment requirements on hundreds of upstream wastewater facilities. A site-specific approach would balance environmental protection with economic feasibility, ensuring that wild rice remains protected without placing undue strain on local governments.

Nitrate – Aquatic Life

The CGMC urges MPCA to take a balanced approach to nitrogen regulation, recognizing both the environmental concerns and the financial impact on municipalities. While we support efforts to address nitrogen pollution where justified, broad nitrate standards could impose significant costs on municipal wastewater treatment plants with limited environmental benefit.

Municipalities contribute only a small fraction of overall nitrogen pollution, yet they face some of the highest compliance costs. MPCA should focus on cost-effective strategies that target the primary sources of nitrate pollution, such as agricultural runoff, rather than imposing expensive

and impractical requirements on wastewater facilities. Additionally, phosphorus—not nitrogen—is the primary driver of algal growth in Minnesota rivers, and regulatory efforts should reflect this reality.

PFAS Water Quality Standards

PFAS management is a critical issue, but municipal wastewater treatment facilities should not bear the burden of removing these chemicals when they are not the source. MPCA must engage municipalities early in the development of PFAS-related regulations to ensure that monitoring, treatment, and compliance measures are practical and cost-effective. Current technology cannot effectively remove PFAS from wastewater, and MPCA's own estimates suggest that compliance costs could reach \$28 billion over 20 years. Any new standards must consider these limitations and focus on source reduction rather than placing unrealistic treatment expectations on municipal facilities.

Conclusion

The CGMC is committed to protecting Minnesota's water resources while ensuring that regulations are fair, practical, and economically feasible for our communities. We appreciate the opportunity to provide these comments and encourage MPCA to take a balanced approach to its regulatory decisions.

Sincerely,

A handwritten signature in black ink, reading "Shelly Carlson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Shelly Carlson
President, Coalition of Greater Minnesota Cities
Mayor, Moorhead