



Dedicated to a Strong Greater Minnesota

September 10, 2025

Corrie Layfield
Minnesota Pollution Control Agency
520 Lafayette Rd.
Saint Paul, MN 55155

VIA Public Comment Form

Re: CGMC Comments on the Minnesota Nutrient Reduction Strategy 2025 update

Dear Ms. Layfield:

On behalf of the Coalition of Greater Minnesota Cities (CGMC), I am writing to provide comments on the Minnesota Pollution Control Agency's (MPCA) draft Nutrient Reduction Strategy 2025 update. The CGMC is a group of more than 110 cities throughout the state of Minnesota dedicated to developing viable progressive communities for families and businesses through good local government and strong economic growth. Our member cities play an important role in protecting the waters of Minnesota through their wastewater and stormwater systems.

We appreciate that the MPCA and its partner agencies are focused on developing a coordinated, statewide approach to nutrient reduction. Still, we are concerned that this strategy continues to place most of the cost on regulated point sources, such as municipalities. Municipal facilities are already facing increasingly restrictive phosphorus limits. The Strategy signals the implementation of future nitrogen and nitrate requirements on municipalities, even though their individual contributions often amount to a single percentage point (or less) of the overall nutrient load.

As indicated by the MPCA's most recent WINS Survey, the costs associated with operating and maintaining wastewater infrastructure continue to grow exponentially, and there is a tremendous unmet need for ongoing infrastructure funding at the state and federal levels. Our primary concern is that the 2025 Strategy could require municipalities to spend even more on upgrades to remove nutrients, especially nitrogen, and that there simply are not enough local, state, and federal resources available to cover the costs. As a result, it is imperative for the MPCA to consider how to prioritize its clean water efforts to ensure that limited local, state, and federal resources are put to maximum effect.

I. General Comments

The 2025 update to the Minnesota Nutrient Reduction Strategy emphasizes broad, statewide reductions in total nitrogen. While the CGMC supports nitrogen reduction where it is scientifically demonstrated to protect human health and aquatic life, the updated Strategy does not provide adequate justification for imposing a categorical statewide requirement for total nitrogen control. A more targeted approach is needed to ensure that resources are invested where they will deliver meaningful environmental outcomes.

Nitrogen reduction efforts should focus on the areas where risks from nitrate are clearly demonstrated, such as drinking water impairments, aquatic life toxicity, or stream health impairments identified through biological monitoring. This approach reflects the scientific evidence and is consistent with the MPCA's own Wastewater Strategy, which prioritizes nitrate where it threatens human health or aquatic ecosystems. By contrast, imposing total nitrogen limits across the board risks misallocating limited resources toward reductions that do not provide measurable local benefits.



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The Strategy also places undue weight on out-of-state and even extraterritorial goals, such as the Gulf Hypoxia Task Force targets and the Lake Winnipeg Action Plan. While the CGMC recognizes the importance of regional collaboration, these targets should not dictate binding requirements for Minnesota cities, particularly when the benefits to local waters are minimal and the costs are substantial. If Minnesota continues to engage in these efforts, meeting these extraterritorial goals should remain voluntary for municipalities.

Finally, nitrogen limits should be expressed as nitrate rather than total nitrogen. Municipal wastewater facilities cannot feasibly remove all forms of organic nitrogen, and forcing costly upgrades to chase reductions that are technologically impractical and environmentally insignificant is counterproductive. Without refinement, the current approach risks diverting substantial public resources into measures that have little impact on local water quality, while increasing energy use and greenhouse gas emissions. New statewide mandates, such as the proposed 10 mg/L State Discharge Restriction, must also proceed through the formal rulemaking process so that the supporting science, costs, and alternatives can be fully evaluated in a transparent and public manner. The CGMC strongly urges the MPCA to revise the Strategy to focus on scientifically supported, locally relevant, and cost-effective approaches that protect Minnesota's waters without imposing unnecessary burdens on communities.

II. The proposed 10 mg/L SDR to protect the Gulf of Mexico

The 2025 Nutrient Reduction Strategy update emphasizes Minnesota's role in addressing Gulf of Mexico hypoxia. The CGMC supports voluntary reduction efforts and nutrient trading to advance these goals, but we remain concerned that Minnesota communities are being asked to shoulder obligations without a clear scientific or regulatory basis. No TMDL has been completed for the Gulf that identifies the reductions required of Minnesota sources, and the public has not had an opportunity to fully evaluate the science underlying these targets. Applying a uniform 10 mg/L total nitrogen limit across all municipal facilities (based in part on Gulf reduction goals) would impose extraordinary costs on cities while providing little measurable benefit, particularly given that agricultural nonpoint sources contribute more than 70% of statewide nutrient loadings.

If Gulf-related reductions remain a priority, the MPCA should pursue a more focused approach: enhanced nitrogen removal at the few largest municipal facilities located directly on the Mississippi River. This targeted strategy would achieve meaningful reductions where they matter most while avoiding unnecessary costs for smaller communities.

III. Lake Winnipeg

Minnesota's municipal wastewater facilities have already made significant progress in reducing phosphorus discharges over the past decade through upgrades and optimization efforts. These improvements have delivered meaningful water quality benefits within the state, and future resources should be directed toward areas where additional reductions are necessary to protect Minnesota's own waters. While the CGMC supports regional cooperation on nutrient reduction, Minnesota's immediate priority must remain on addressing in-state needs before imposing additional costs on municipal facilities to address problems that originate outside of Minnesota's borders.

With respect to Lake Winnipeg, phosphorus reduction efforts by municipal facilities should remain voluntary and supported through collaborative initiatives like the multi-city program administered by the



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Red River Basin Commission. Given Minnesota's relatively small contribution to the basin compared to upstream and Canadian sources, additional mandates on our facilities would impose disproportionate costs without measurable improvement toward the Lake Winnipeg goal. Voluntary, locally driven efforts have proven effective and should continue to be encouraged where they are cost-effective and supported by local partners.

The CGMC is committed to protecting Minnesota's water resources while ensuring that regulations are fair, practical, and economically feasible for our communities. Thank you for your consideration of these comments.

Sincerely,

Keri Johnson
City Councilor, St. Peter
President, Coalition of Greater Minnesota Cities