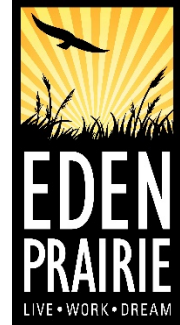


To: Corrie Layfield, Minnesota Pollution Control Agency
From: Lori Haak, Water Resources Coordinator
Patrick Sejkora, Water Resources Engineer
Date: September 9, 2025
Re: Minnesota Nutrient Reduction Strategy 2025 Update



The City of Eden Prairie appreciates the opportunity to comment on the 2025 update to Minnesota's Nutrient Reduction Strategy. Below please find our comments and some questions for additional consideration stemming from the draft strategy.

Priority Comments:

- Pages xxi, 57, 59; Figure ES-7, Table 2-16, Table 2-17: It is clear the largest sources of phosphorus and nitrogen to Minnesota's rivers are related to agriculture. As a result, the approaches to nutrient reduction should be implemented holistically based on watershed loading sources.
- Page 15: Addressing streambank erosion is a reasonable initiative for municipal and WD/WMO partners, SWCDs, and counties to undertake with funding assistance from the State. State agencies need to align on permitting requirements (e.g., DNR vs. MPCA on erosion and sediment control) and pollutant reduction TMDL accreditation for in-creek stabilization projects.
- Chapter 3: Nutrients are not the whole story. Climate (temperature + precipitation) are also likely to exacerbate eutrophication. According to Meerhoff et al. (2022), "Based on a complex combination of models, Ockenden et al. (2017) suggested that the effects of climate change on surface runoff and consequent increase in diffuse P loading to freshwaters might be limited only by large-scale agricultural changes (e.g., 20–80% reduction in current levels of P inputs)." This suggests a future where agriculture is the only realm where nutrient loading can be substantially reduced.
- Chapter 4, Urban Nutrient Reduction: Stormwater staff at MPCA are already under resourced. MPCA must work closely with stakeholders to prioritize items, design programs, and make substantial investments primarily in practices that yield measurable results when it comes to nutrient reduction in urban stormwater.
- Page 144: While important as tools in a multi-faceted campaign, guidance and fact sheets will not result in significant behavioral change. The potential of community-based social marketing (CBSM) in nutrient reduction (and other areas of sustainability) is significant but underutilized. One idea would be to house several CBSM positions at MPCA and allow regulated MS4s, WWTFs, SWCDs, etc. to enlist these specialists to develop new programs. Such a program would be more likely to affect sustained, widespread behavioral change.
- Page 151: The State should provide solid, unified, statewide messaging and branding to foster public awareness and engagement and support local efforts. The State cannot undertake this in isolation, but with meaningful, continued collaboration with stakeholders.
- Page 241: Conservation Agronomist positions like the one hired in Morrison County seem like an important first step in meaningful agricultural nutrient reduction. SWCDs are uniquely qualified to provide practical guidance for the agricultural sector.

General Comments:

- Page xviii: "Minnesota's 45% phosphorus reduction goal for the Gulf will be met if the in-state goals for local and regional lake eutrophication, in-state river eutrophication, and reductions in southeastern Minnesota tributaries to the Mississippi River are achieved." Which "in-state goals" does this reference? TMDLs? TMDLs + additional work?

- Page xix: “If nitrate concentrations are reduced by about 40% in rivers and vulnerable groundwaters...” How far will current TMDLs get us toward that benchmark?
- Page xix: “About two-thirds of the TP load reduction is attributed to point source wastewater improvements and the rest from agricultural and urban nonpoint source reductions.” How far will current TMDLs get us toward that benchmark?
- Page xxix: It seems the funding provided by the Clean Water, Land and Legacy Amendment is central to achieving these (and many other) clean water goals. Is renewing the amendment prior to its expiration in 2034 being prioritized by the State?
- Page 5: “Updated science on climate and other external influences.” What is the anticipated impact of ATLAS 15 on NRS projections?
- Page 285, Section 8.3: Are the answers provided based on this report? If so, provide citations for sections. If not, provide more context about who answered the questions.

Miscellaneous Comments:

- Page xviii, Figure ES-2: 15 years is an aggressive timeline. Does the funding allocated match the need?
- Page xxvi: Do the 22 practices take land out of production? Is this an issue?
- Page xxvi: Is it possible to provide a matrix showing recommended practices with co-benefits?
- Page xxvii: Is it feasible to install millions more acres of practices in Minnesota to realize the nutrient reduction goals?
- Page 70, Section 2.10, Items 6-8: These actions are vague for the magnitude of reductions needed.
- Page 241: While a large majority of farms in Minnesota are currently family farms, the number of acres moving into larger, corporate operations is likely increasing. Consider developing new/different approaches where there may not be a direct connection between local natural resources/land stewardship and business.