



**MISSISSIPPI
WATERSHED
MANAGEMENT
ORGANIZATION**

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September 10th, 2025

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

Dear Corrie Layfield,

Thank you for the opportunity to comment on the Minnesota Nutrient Reduction Strategy 2025 update. The Mississippi Watershed Management Organization (MWMO) is a watershed management organization within the Twin Cities seven-county metro area that monitors the water quality of the Mississippi River and the water quality and volume of stormwater flowing into it from pipesheds within our boundaries. We partner with our member communities to invest in green stormwater infrastructure to improve water quality, habitat, and natural resources in an urban watershed that drains directly into the Mississippi River. Our 39.5 square mile management area wholly resides within the Mississippi – Twin Cities HUC-8 watershed (07010206).

The MWMO appreciates the technical detail that has gone into the Minnesota Nutrient Reduction Strategy update, including loads and trend calculations updated with more recent monitoring data, and the integration of more up-to-date modeling results. We will look for ways to incorporate the scientific information and strategies identified in this 2025 update in our next watershed management plan, which will be updated for 2031.

After reviewing the NRS update document, we request clarification pertaining to total phosphorus (TP) and total nitrogen (TN) exports and concerns for the Mississippi – Twin Cities HUC-8 watershed (07010206).

The Mississippi – Twin Cities watershed is identified in Figure 2-29 as a high priority watershed for both TP and TN impacts downstream of Minnesota. In addition, the HUC-10 watershed that includes the MWMO is identified in Figure 3-12 as highest local priority for TP and in Figure 3-26 as medium local priority for TN. As outlined in Section 2.8, the Mississippi – Twin Cities watershed is estimated through modeling to contribute TP yields that are multiple times higher than the next highest watershed value (Figure 2-31).

In our review of the report, we were not able to understand the reason for significantly elevated phosphorus and nitrogen loads from the Mississippi – Twin Cities watershed compared to other watersheds. The largest contributing sources of pollutant loads in the Mississippi River Basin are summarized in Table 2-24 to be cropland runoff for TP and tile drainage for TN. These sources have a small impact in the highly urbanized Twin Cities watershed. Are there different source rankings or unique nutrient pollution sources in the Mississippi – Twin Cities watershed that increase estimated loads compared to other watersheds? Separately we note that seven of the 80 HUC-8 watersheds in Minnesota, including the Mississippi – Twin Cities watershed, were modeled with SPARROW while the rest used HSPF modeling. Are the observed elevated loads an artifact of trying to combine and compare the results of two different models in one analysis? Given how much the TP load for the Mississippi – Twin Cities watershed stands out in Figure 2-31 particularly, we request a re-evaluation of the loads presented in the report or dedicated space to explain the drivers of these elevated loads, and strategies for effective nutrient management in this watershed.

We would also like to suggest an appendix with more detail on the model inputs and the identified sources of nutrient loads at the HUC-8 watershed scale. Additional details will help to inform management and planning in the state, as well as at the HUC-8 scale, including in our watershed.

In addition to the feedback above, we have some editorial comments for the NRS update:

- It could be helpful for background and narrative to move Chapter 6 up to be the second chapter in the NRS update.
- On page 44, we believe Figure 2-19 is a figure of TP load at Mississippi River La Crosse, not TN load as intended, and should be replaced.
- In the appendix document, Table 60 starting on pg. 207, we believe the values have been switched between the TN and TP columns.
- We found several figures to be too blurry to read detailed text (2-26, both 2-31s, both 2-33s, 3-1, 3-14, and others). This may reflect the draft form of the document and resolve when the document is published in full.

Thank you again for the opportunity to review and comment on the Minnesota Nutrient Reduction Strategy 2025 update.

Sincerely,



Mirae Guenther
Water Resources Data Analyst



Emily Resseger
Monitoring, Assessment, and Research Manager