



September 8, 2025

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

RE: Comments on the Minnesota Nutrient Reduction Strategy 2025 Update
Metropolitan Council Referral File # 23109-1

Dear Ms. Layfield,

The Metropolitan Council (Met Council) has completed its review of the Minnesota Nutrient Reduction Strategy 2025 Update (NRS). The NRS outlines Minnesota's nutrient-related water challenges, provides insight into current conditions for our major watersheds, highlights successful projects and programs, and offers strategies to achieve the ambitious goals set in the original 2014 Minnesota Nutrient Reduction Strategy. The Met Council agrees with the key message of this document – without additional measures to accelerate our nutrient reductions across the state, we will fall short of the 2040 goals.

Met Council staff commends the interagency team of authors, data assessment scientists, monitoring staff, and others who all helped to contribute to this well-written and organized document. It is abundantly clear that the team utilized many sources of data, information, and resources to tell this overall narrative. The Met Council appreciated being included in the development of this document both in the metro-specific water quality assessments and the drafting of the chapters themselves.

Met Council staff also applaud the acknowledgement that the state needs to clearly tell this story of our shared clean water goal of nutrient reduction in new and innovative ways. The commitment to having online resources such as dashboards and engaging videos will help to spread this message to many more residents and raise awareness of this challenge. One clear message of the NRS is that we need to increase our capacity to implement actions, which happens at all levels of government, but many times relies on individuals to take action.

General concerns

The NRS provides strategies to achieve water quality goals, however, the Met Council maintains some concerns that we raised in the development of this document about how the state assigns responsibility and the overall cost of implementation. We hope by reiterating these issues, that they might be addressed in the final version of the NRS. Our broad concerns are stated below:

1. Resource prioritization under the Clean Water Act

- The Met Council is committed to nutrient reduction, but implementation must align with Integrated Planning under the Clean Water Act, which requires prioritization based on risk, affordability, and measurable impact.

2. Regulatory Clarity and Premature Standards

Clear separation between strategic direction and regulatory implications is essential for effective planning and compliance.

- The Met Council strongly urge MPCA to defer citing or implying new regulatory standards until they are fully developed.
- Ambiguity in narrative language (e.g., implying numeric limits or enforcement-based expectations) risks creating confusion.

3. Data Gaps, Practical Tools, and Implementation Barriers

The NRS should be realistic, grounded in implementation realities, and transparent about where data or proven strategies are still lacking.

- Clarify when data does not yet exist, rather than implying gaps can be immediately closed.
- Acknowledge that effective strategies (e.g., for stormwater, nonpoint source reductions) require scalable, fundable approaches that are still under development.

Executive Summary and Global Comments

The 'Met Council' is the appropriate way to reference our agency. Please replace 'MCES' with "Met Council" throughout the document, including tables, graphs, and footnotes.

Many of the maps in the Executive Summary and subsequent chapters have multiple sources of information on them, which makes it difficult to read. Consider simplifying the amount of information displayed on each map or have side by side maps to compare and contrast the information.

The color scales of the maps (red-green scales) may be difficult for people with colorblind vision impairments to interpret.

On page xxviii, under the *Strategies of other sources* section, the word 'sewage' is missing from the subsurface treatment system program. It should read Minnesota's subsurface sewage treatment system.

Consider adding the term 'geologically vulnerable' to the glossary.

Chapter 1 Comments

No comments on this chapter.

Chapter 2 Comments

Consider adding a similar bar for the forms of phosphorus (Total, dissolved, particulate, soluble reactive P) in Figure 2-1.

When describing the river basins in the state in section 2.2, consider including the percentage of land area each has in the state.

In the figures that show flow and load timeseries (e.g., Figure 2-10, Figure 2-11), having the flow as decimals with a multiplier in the axis label is overcomplicating the message. Consider having the axis steps as whole numbers with a smaller multiplier.

Figure 2-15 should be two different graphs. Having two different data sources on the primary x axis is too complicated, especially since the scale of the axis flattens the 5-year rolling average. If you have this as two graphs (one of flow and TP load and one of flow and FWMC) it would be clearer.

Figure 2-19's secondary x axis is mislabeled, it should be TN Load, not TP Load.

Figure 2-23 does not show FWMC, the primary axis is incorrect.

Chapter 3 Comments

In the Key Messages, there should still be a bullet for the Superior Basin for both N & P, while there might not be basin-wide needs for reduction, there are still local concerns for eutrophication-impaired lakes and river concentration trends.

On pages 72 and 74, the term 'Gulf of Mexico' is used to describe the Gulf. The naming should be consistent with other mentions of the body of water.

In Figure 3-11, it is very hard to understand/see the stream assessment line work.

On page 91, in the numbered list at the bottom of the page, there is a differentiation between local and regional lakes impaired by eutrophication. Can you add more context about how the NRS defines these categories?

Figures 3-16 and 3-17 are misleading. The category of "unchanging conditions" could imply nitrate trends that are flat but exceed drinking water quality standards OR trends that are flat but below drinking water quality standards. Perhaps there should be four categories on these pie charts for clarity?

Chapter 4 Comments

If the Met Council explores nutrient trading, we will need to partner with producers outside of the metro area, as this is where the majority of nutrients in the Minnesota River originate. This may require changes in statute or other policy to be implemented for our system.

On page 116 and in many subsequent areas of this chapter, it is noted that the number of permits with TP effluent limits increased. What is the total number of permits? The increase is good to note, but without this context it's hard to establish the magnitude of this change. Additionally, are there any permits that are in violation for TP? This gives insight into the complete picture of permitted TP limits.

Section 4.1.3 identifies current funding sources for wastewater treatment in the state; however, it must be stated that with the cost of process changes, these will not be sufficient to meet the goals in the NRS. Additional funding sources must be identified.

In Section 4.1.4 it was noted that high costs are a concern for utility managers. That is true, but the Met Council has a larger concern that the proposed state discharge restriction (SDR) is both high cost and minimal impact to the Gulf. There is also concern that stricter rules are being developed for sites that can meet the proposed nitrate WQS.

On page 144, the One Watershed One Plan program is identified as a platform for achieving stormwater management goals. The 33 metro watershed plans should also be identified as a pathway for achieving these goals.

Chapter 5 Comments

Almost half of the metro area is comprised of agricultural land uses. Like greater Minnesota, we have been encouraging our rural residents to adopt best practices to keep nutrients on the landscape and out of our waterbodies. In section 5.2, the NRS highlights local program successes, and it would be a good opportunity highlight the success of metro-area programs as well. The Dakota County's Agricultural Chemical Reduction Effort (ACRE) has used a variety of approaches to engage with the agricultural community and other stakeholders to develop, consider, and refine this program's strategies and tactics to reduce nitrate contamination in water supplies. It combines groundwater quality monitoring and modeling and other technical assistance to improve the water quality in the county. By highlighting programs like ACRE, the NRS can show the metro region and greater Minnesota have shared agricultural water challenges.

In Figure 5-12, consider adding an inset map of the whole state to identify where the area shown is located.

Chapter 6 Comments

Thank you for highlighting the Minnesota Water Management Framework in this chapter. It is a very important collaboration between all the MN water agencies and deserves this attention.

On page 223, there is a sentence that states, "Metro municipalities are also required to develop and implement local water management plans," as a part of the metro watershed management process. These local water plans are also important elements of the metro area's Comprehensive Planning Process led by the Met Council. This is another opportunity to show the interwoven water planning process between the region and the state.

In section 6.3.3, the NRS highlights the need to tie the 1W1P and WRAPS plans to the overall NRS goals. On page 235, the NRS states that BWSR and the MPCA will cooperatively develop guidance for these programs. If this will apply to the metro watersheds, then there should be language to be clear about this expectation in the NRS.

Chapter 7 Comments

On page 264, the NRS identifies needs for expanded and improved data collection methods on agricultural practices, including the tracking of small-scale stormwater practices and long-term forest management practices. These are not just an agricultural area need, but something that should be implemented across the whole state. It is vital for us to track urban stormwater practices and the urban forest to understand how upland practices affect our water quality.

Chapter 8 Comments

On page 287, bullet j states "Urban stormwater management. As described in in the Agricultural BMP Handbook and the Minnesota Stormwater Handbook, including MIDS." Consider removing the word Urban from the start of this sentence. Stormwater management is important to both agricultural and urban areas.

Thank you for the opportunity to participate and provide feedback—we appreciate seeing comments and suggestions offered through our letter or participation in that committee reflected in the draft content. Also, thank you for the opportunity to review and comment on this plan. If you have any questions regarding these comments or wish to discuss them in greater detail, please contact Jen Kostrzewski at 651-602-1078 or email at Jennifer.kostrzewski@metc.state.mn.us.

Sincerely,

Sam Paske

Sam Paske (Sep 9, 2025 16:29:38 CDT)

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