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Thanks to MPCA for the opportunity to submit comments on an updated Nutrient Reduction Strategy. I'm happy to submit the attached comments on behalf of the Institute for Agriculture and Trade Policy.



September 9, 2025

To: Minnesota Pollution Control Agency

Re: Nutrient Reduction Strategy

The Institute for Agriculture and Trade Policy (IATP) thanks the Minnesota Pollution Control Agency (MPCA) for the opportunity to comment on the proposed Nutrient Reduction Strategy (NRS). IATP is a 38-year-old non-profit based in Minnesota that works for sustainable food, farm and trade systems.

We applaud MPCA for updating its nutrient reduction strategy and setting goals for phosphorous and nitrogen reduction. Despite some progress, water pollution continues to be a major problem for the state, affecting the health of ecosystems and people. High levels of nitrates in water are rooted in escalating cropland acres dominated by corn, which is highly dependent on synthetic nitrogen fertilizers, according to the Minnesota Department of Agriculture.¹ The MPCA reports that 89% to 95% of the nitrate in waters in southern and central Minnesota comes from cropped fields.²

Statewide, high phosphorus concentrations cause eutrophication impairments in 686 Minnesota lakes and 50 rivers. We agree that to meet the state's 2040 targets, phosphorus in these lakes and rivers should be reduced by an average of 42% from recent conditions, and nitrate concentrations should be reduced by 40% in rivers and vulnerable groundwaters.

The state needs to support pathways for farmers to shift what we grow and how we farm. Agriculture is the number one source of phosphorous and nitrogen water pollution in Minnesota. We agree with MPCA that "nutrient reduction from cropland is especially needed." We also believe that changes in farming designed to reduce nutrient pollution also need to benefit farmers and rural communities.

There is a growing consensus within the state that changes in crop rotation (beyond corn), and more continuous living cover will reduce the need for heavy fertilizer use. The growth of large animal feedlots, which store enormous amounts of manure that is often liquified and over-applied to cropland as fertilizer, is another major source of water pollution in the state.³ We urge the state to coalesce behind strategies that transition animals out of big feedlots and onto pasture (reducing the overapplication of liquified manure), add more small grains and perennials into rotations, expand cover crop options, restore wetlands and prevent the over-application of nutrients.

¹ <https://www.mda.state.mn.us/sites/default/files/docs/2025-07/cornfertsalesovertime.pdf>

² <https://www.pca.state.mn.us/sites/default/files/wq-s1-87a.pdf>

³ <https://www.ewg.org/research/five-years-after-ewgs-first-analysis-manure-still-overloads-minnesota>

In support of Minnesota's NRS targets, IATP makes the following specific recommendations:

- Align resources and programs for nutrient reduction. We urge MPCA to align nutrient reduction strategies where appropriate with the Climate Action Framework the state is currently updating. Additionally, the state should work with the U.S. Department of Agriculture to steer federal farm conservation resources within the Environmental Quality Incentives Program (EQIP) and the Conservation Stewardship Program (CSP) toward farming practices and systems that reduce synthetic fertilizer use and shift animals to pasture. These efforts can be augmented by state programs such as the Minnesota Agricultural Water Quality Certification Program.
- We support the NRS recommendation to “accelerate the transition to perennials, pasture, small grains, and harvested cover crops,” through “creating a task force to develop a CLC campaign to establish the next million acres of CLC.”
- Bolster the MPCA's feedlot program to go beyond a single feedlot assessment model within watersheds. A cluster of feedlots within regions of the state can pose particular risks to watersheds. In addition to stronger permit requirements on manure storage and application, the state should consider the cumulative effects of feedlot clusters within watersheds when considering the approval of new or expanding feedlots.
- Strengthen data collection and reporting requirements for fertilizer retailers by the MDA and document nitrogen fertilizer application rates from retailers. This data addresses a gap in the reliability and frequency of data that can be used to inform actions needed to hold retailers accountable to nitrate reduction goals. As part of this strategy, we urge MDA to set reduction targets for synthetic fertilizer use and sales.
- We support the Land Stewardship Project's call for a Small Grain Initiative,⁴ with similar levels of funding and a long-term commitment from the MDA and the University of Minnesota, modeled after the visionary Forever Green Initiative.⁵
- Expand investment in Soil and Water Conservation Districts (SWCDs) as a trusted local partner for nutrient reduction strategies. A model to consider statewide is the locally led, flexible and outcome-based approach adopted by the Olmsted County Groundwater Protection and Soil Health Program.⁶

IATP appreciates the opportunity to submit these comments on the NRS. We welcome any comments or questions and look forward to its finalization and implementation.

⁴ <https://landstewardshipproject.org/oats-the-3-legged-stool-of-farm-resiliency/>

⁵ <https://forevergreen.umn.edu/>

⁶ <https://landstewardshipproject.org/wp-content/uploads/Rooting-Out-Nitrates.pdf>