

Lower Minnesota River Watershed District

112 E. 5th Street, Suite #102
Chaska, Minnesota 55318



LOWER MINNESOTA RIVER
WATERSHED DISTRICT

September 3, 2025

Minnesota Pollution Control Agency

Attn: Corrie Layfield, Nutrient Loss Reduction Strategy Coordinator

520 Lafayette Rd.

Saint Paul, MN 55155

RE: Minnesota Nutrient Reduction Strategy 2025 update

Dear Minnesota Nutrient Loss Reduction Strategy Steering Committee:

The Lower Minnesota River Watershed District (LMRWD) Board of Managers and Staff appreciate the opportunity to provide comments on Minnesota's draft Nutrient Loss Reduction Strategy ("Strategy"). The updated strategy is a great example of cross agency collaboration rooted in science to inform the management of nutrient loss on Minnesota's landscapes. Please consider our broader comments about the need for increased funding and innovative action directed towards the Minnesota River Basin.

By way of introduction, the LMRWD was founded in 1960 initially to serve as a local sponsor for the U.S. Army Corps of Engineer's dredging and maintenance of the 9-foot navigation channel in the navigable portions of the Minnesota River. The LMRWD's (herein called the "District") responsibilities have expanded substantially since then to include surface and ground-water quality and management; floodplain and flood management; erosion and sediment control; and public education and outreach. The boundaries of the LMRWD do not conform to a watershed but instead span bluff to bluff. As a result, the District is challenged by upstream and surrounding land management and associated runoff that reaches the main stem of the LMR. According to the Collaborative for Sediment Source Reduction Report, one third of the discharge and two thirds of the sediment in Lake Pepin is delivered from the Minnesota River (Wilcock et al., 2016). More sediment in the channel has increased dredging responsibilities, all of which are funded by taxpayers. Climate change impacts, including increasing discharge and precipitation have further exacerbated the District's ability to manage and protect its natural resources.

We observe in the draft Strategy that priority watersheds identified with greatest need to reduce nitrogen and phosphorus loading continue to be in the Minnesota River Basin. While some of the trends, particularly the total nitrogen trend at Jordan, MN on the Minnesota River is encouraging, there is a significant amount of work and adoption of practices that is needed to meet the Hypoxia Task Force



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nitrogen and phosphorus reduction goals. Furthermore, examples such as the Rapidan Dam failure in June 2024 in Blue Earth County released 11.6 million cubic yards of sediment high in phosphorus and nitrogen (according to the Minnesota Department of Natural Resources), highlight both the challenges of managing legacy sediments and economic decisions that led to the dam failure.

The Steering Committee may recall former Governor Arne Carlson’s declaration in 1992 to make the Minnesota River “fishable and swimmable” in 10 years. Yet 33 years later, the impairments on the Minnesota River are expansive and unchanging. According to the [2024 impairment list](#), the Minnesota River has impairments for:

- Benthic macroinvertebrates bioassessments
- Escherichia coli (E. coli)
- Total suspended solids (TSS)
- Nutrients
- Turbidity
- Polychlorinated biphenyls (PCBs)
- Mercury in water column
- Fecal coliform
- Mercury in fish tissue
- PCBs in fish tissue
- Polychlorinated biphenyls (PCBs)
- Dissolved oxygen

As the draft Strategy highlights, Minnesota, as a headwaters state, has a responsibility to do our fair share and meet the nutrient loss reduction goals set by the Hypoxia Task Force. The District Board and staff feel that responsibility, to improve water resources locally and improve the quality of life for residents, businesses, and everyone in between. It is time for the Minnesota River Basin inhabitants to do their fair share.

We urge you to utilize this draft Strategy as a springboard for:

1. Cooperate towards a standard open-source and open-access data and modeling system so we can work across jurisdictions to coordinate cumulative impacts when reviewing permits.

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2. Have watershed-specific models interface with the land use and food, fiber, and fuel produced in the Minnesota River Basin so we can assign fair values across urban, suburban, rural, and industrial supply chains – e.g., regenerative agriculture and payments for ecosystem services
3. Bringing more funding and innovative strategies to address nutrient and sediment contamination in the Minnesota River Basin.
4. Help us set an ambitious goal that can be written into our plans, rules, and budgets.

Thank you for considering the comments in this letter. Please find enclosed the District's vision for its next iteration of its watershed management plan below. Feel free to contact Administrator Will Lytle, PhD (admin@lowermnriverwd.org) or (906) 231-2556) with any questions.

Sincerely,

Joseph Barisonzi

President, LMRWD Board of Managers

LMRWD Launches Visioning Phase for 2028 Watershed Management Plan

Posted: [06/26/25](#)

The Lower Minnesota River Watershed District (LMRWD) is excited to announce the launch of its formal planning process to update the District's **Watershed Management Plan (WMP)**—the foundational document that will guide our strategic priorities and actions through 2028 and beyond.



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As part of this process, the District will be rolling out a series of **visioning workshops, stakeholder engagement sessions, and coordinated communications** throughout 2025. These activities are designed to shape a bold, inclusive vision for the watershed—one rooted in data, community priorities, and shared accountability.

Board Endorses “The River Will Not Wait” as a Guiding Framework

At its June 18, 2025 meeting, the LMRWD Board of Managers unanimously endorsed *The River Will Not Wait*, a policy address delivered by President Joseph Barisonzi at the 17th Minnesota River Congress. This powerful set of remarks will serve as a **core planning framework** for the WMP update.

In the speech, Barisonzi calls for urgent, systemic action to reverse the decline of the Minnesota River system. The Board has directed staff and partners to integrate these core messages into:

- The WMP vision and planning goals
- Upcoming **public visioning events** (beginning July 30, 2025)
- All related communications, engagement materials, and policy development

Seven Key Policy Challenges Identified in the Speech:

1. **The Problem is Bigger Than Any One Project**
Isolated efforts are insufficient; systemic planning is required.
2. **Every Decision Matters – Even Yours, Even Mine**
Cumulative impacts from everyday decisions must be considered.
3. **No Plan Without Real Targets**
Watershed plans need measurable goals, timelines, and accountability.
4. **Agencies Must Do Their Jobs**
Stronger enforcement and verification are needed to restore trust and impact.
5. **We Must Reimagine Governance**
Over 300 fragmented entities govern the basin; integrated action is essential.
6. **We Must Fund the Future Creatively and Fairly**
Innovative and equitable financial tools are critical for lasting solutions.

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7. **This Is Our Moment**

The window to act boldly and collectively is now.

Download:

- [***The River Will Not Wait***](#) Speech
- [**Full Annotated Bibliography & Supporting Documents**](#)