FRESHWATER

September 9, 2025

Minnesota Pollution Control Agency
MPCA submission portal

Re: Minnesota Nutrient Reduction Strategy 2025 update

Dear Commissioner Kessler and colleagues,

We appreciate the opportunity to submit ideas as you consider updates to the Minnesota Nutrient Reduction Strategy.

This document represents a challenging and much needed coordination effort between state and federal agencies, research and academic partners, and local governments charged with implementing solutions to the unacceptable level of nitrate and phosphorus pollution that has persisted in Minnesota for decades.

With Minnesota groundwater and surface waters heavily impacted by agricultural land use, we value your work in promoting soil health practices and incentivizing reduced application of manure and chemical fertilizers. We also appreciate the current rulemaking efforts underway to improve MPCA oversight of Minnesota's feedlots.

Still, we know that new ways of thinking and funding will be necessary in order to make measurable progress, particularly on the issue of nitrate from agricultural sources.

To follow are several areas we believe deserve particular attention:

- **Implementation of comprehensive watershed plans**
  - It is a great accomplishment that Minnesota has developed a One Watershed One Plan for nearly every watershed across the state. Now is the time to put all available resources into implementing these plans, and this may require shifting state priorities away from new studies or other programs and activities that do not directly support implementation. The nutrient reduction benefits from on-the-ground projects may take years to fully realize, so time is of the essence as we work to reduce nitrate levels in groundwater and clean up our rivers, lakes and streams. Furthermore, it is important to study the effectiveness of the practices being implemented to ensure state dollars are being spent effectively.
- **Water Storage Program**
  - The MPCA has discerned that tile water is the largest source of nitrogen in drained farmland. That source, along with the nutrient-rich legacy sediment entrained by high flows that result from agricultural drainage are best controlled by water storage in headwaters areas of agricultural watersheds through a variety of means including wetland construction. If we do not offset the impacts of agricultural drainage, we will lose ground (literally) and fall behind in our efforts to reduce nutrient runoff.
- **Soil Health Financial Assistance**
  - We are pleased to see continued support for this program, which is a powerful tool for driving adoption of soil health practices by providing farmers with better access to specialized equipment.

- **Incentivizing measurable soil health practices**
    - During the 2025 legislative session, the Omnibus Agriculture bill included a $75,000 appropriation to conduct a study of the practices and performance of the Olmsted County groundwater protection and soil health initiative. This program has been successful at incentivizing and educating farmers to implement practices that can reduce nitrate – such as cover crops, small grains, and haying or grazing. Since 2023, the program has reduced an estimated 295,000 pounds of nitrogen and could serve as a model for other parts of the state. We are interested in working with state agencies and legislators to refine this concept and develop programs that directly incentivize farmers for implementing measurable, long-term improvements on their land.

Thank you for continuing to prioritize clean water, and thank you for your work on behalf of the State of Minnesota.

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