

Minnesota Pollution Control Agency  
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The undersigned agricultural organizations offer the following feedback to the draft updated Nutrient Reduction Strategy (NRS).

Regarding the key messages in the NRS, we agree that it's complicated, and we encourage the MPCA to work toward messaging that is more understandable to the average Minnesotan, who has a strong interest in protecting water resources but doesn't have the wherewithal to sort through a document of more than 1,500 pages. Concentrations, loads, flow weighted, flow normalized- pick the most relevant and make it understandable.

Overall, nutrient trends are good, as noted in the updated NRS. This is a very important message and should be highlighted. That there is still more work to be done is understandable but should not detract from the general improvement message.

We agree with the use of adaptive management strategies, including periodic review of progress toward goals and of the goals themselves.

We appreciate the inclusion of drainage water recycling as a part of the plan. While many Minnesotans may not be familiar with the agricultural practices of irrigation and drainage, the agency needs to understand that these two practices rarely occur on the same fields. Irrigation is used to add water to soils that lack water holding capacity. Tile drainage is utilized to remove only excess water from soils that lack natural drainage ability. The concept of capturing drainage water for use later as an irrigation source, either on the same fields or on other fields as the landscape allows, would benefit downstream waters and provide another risk management tool for farmers.

The Board of Water and Soil Resources has a program that could be modified to accommodate drainage water recycling. The program currently supports modification of drainage systems to include water storage but does not include provisions specific to reusing this captured water for irrigation. Interagency coordination would be required to allow drainage water recycling to grow and contribute to the MPCA's desired nutrient reduction goals.

We appreciate the MPCA's acknowledgement that farmers have "made good progress" on nutrient reduction. Much of this improvement has been due to better nutrient use efficiency. As shown in the appendix material, fertilizer applied per unit of production has been dramatically reduced. We believe it is very likely that this trend will continue as farmers seek to reduce input costs. Research and technology development have contributed to nutrient efficiency advances, and this important work continues. The updated NRS seems to suggest that these advances will stop. They will not. We

suggest that the MPCA pivot, supporting more nutrient efficiency research. This would most efficiently be done by providing matching funds to the Agricultural Fertilizer Research and Education Council (AFREC) program administered by the MDA.

We do not agree with the exaggerated emphasis on CLC practices. While we continue to support programs like CRP and rational investment in exploring new crops, we believe the agency approach is too critical of current cropping systems which provide the commodity crops society depends on. In addition to exploring new crops, the agency should help farmers build on their “good progress” in producing the current mix of crops. Minnesota is home to the most diverse crop mix in the Midwest.

The NRS includes mentions of state buffer requirements, noting the near-100% compliance with the current buffer law. Does monitoring show improved water quality due to passage and implementation of the buffer law?

Streambank erosion was identified as a significant source in the 2014 NRS. We believe this is still a significant, often misunderstood and underestimated source of sediment and phosphorus.

We are very concerned with the MPCA’s use of draft nitrate standards for analysis. While the NRS notes that standard development is independent of the NRS, these draft values are referenced. Nitrate standards have been under development for more than a decade with little progress. We ask for greater transparency and public availability of all research being used in the process. As the agency has stated in the past, nitrates are relatively low in toxicity. Let science guide the process, not alarmist rhetoric.

We do appreciate the agency’s efforts to keep Minnesotans informed about this important process and look forward to more communication throughout the life of the plan.

Sincerely,

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Agricultural Water Resource Center

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Minnesota Pork Producers Association

Jake Thompson, President  
Minnesota State Cattlemen’s Association

Jim Kanten, President  
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