Minnesota Environmental Partnership

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September 10, 2025

To: Minnesota Pollution Control Agency

Re: Nutrient Reduction Strategy

Minnesota Environmental Partnership (MEP) and the undersigned groups deeply appreciate the State of Minnesota's efforts to update the Minnesota Nutrient Reduction Strategy (NRS). Current actions have achieved some successes on limiting nutrient pollution to Minnesota's groundwater, surface water, and downstream neighbors, but the growing nitrate crisis in parts of the state makes it clear that a significant shift in approach is needed if the state is serious about meeting its 2040 water quality goals. Updating the strategy is essential to protect the health of humans, wildlife, and the natural systems we depend on.

MEP and others have signed on in support of a separate comment letter entitled: *Establishing Outcomes-Based Data Collection and Alternative Pathways to Nitrogen Reduction in Minnesota's Nutrient Reduction Strategy.* In addition to our support for the recommendations of that separate letter, we wish to expand on these comments in this letter.

We are especially heartened by the draft strategy's emphasis on campaigning to expand continuous living cover (CLC) crops and systems, an effort that MEP and our members have supported for more than a decade. We fully concur with the strategy's confirmation that "Nitrogen reduction goals cannot be achieved without transformative changes in crop system rotations and maintaining living cover for more months each year." We also understand that to be successful, the state should pursue a layered strategy where all promising strategies are pursued as possible, to achieve state goals.

Support for Market-Based Continuous Living Cover Campaign & Task Force

Minnesota has an outsized influence on agricultural research, especially in continuous living cover research led by the University of Minnesota's Forever Green Initiative. We appreciate the strategy's inclusion of supporting this research, which leaves our state well-placed to implement continuous living cover on a large scale.

This campaign can provide multiple benefits to our state simultaneously: significant reduction in nutrient pollution, income for farmers who can harvest these crops, increased climate resilience, and support for new green

industries in Minnesota's economy. The task force should focus on the highly beneficial market-based CLC crops and link with the work underway at the University of Minnesota's Forever Green Partnership that has developed a highly successful collaborative that includes stakeholders from academia, agriculture, business, policy advocacy and government.

Support market-based continuous living cover crops

After working with and supporting the University of Minnesota's Forever Green efforts to promote the development and use of continuous living cover cropping systems for many years, we find the use of the term CLC in the NRS confusing. The name itself in fairly self-explanatory, meaning plant cover on the soil and roots in the ground all year long. However, what has distinguished the work of Forever Green is that all of these crops produce a marketable product that will drive the adoption of these crops and offset many of the related transition costs over time. This convergence of benefits provides not only an effective solution to agricultural water quality impacts, but also an affordable, durable strategy that can scale to meet the challenge at hand.

The general assessment of CLCs in the report does not differentiate between market driven and non-marketable crops. We recommend that the discussion of CLC strategies recognize this characteristic as part of the definitions and only include market based crops as CLC crops or, at a minimum, those that are market based, should be analyzed and assessed separately from non-marketable crops. Non-market based plants can be considered separately.

Using this definition, we question the assessment in Table 5-9 on page 186 that the Forever Green strategies are rated as a medium level of innovation. Considering the historic reliance on government incentives for the adoption of traditional modestly impactful best management practices over the last several decades, the Forever Green approach is not only highly innovative, it is transformative in developing new systems that not only protect our water and other valuable natural resources but also return a profit to farmers. We recommend that Forever Green be recognized as highly innovative.

Align allocation of state water resources with strategies that show the most potential to reach water quality goals.

With the NRS recognition that "Nitrogen reduction goals cannot be achieved without transformative changes in crop system rotations and maintaining living cover for more months each year;" it is past time for the state to better align its investment of funds to support the development and use of CLC crops. This includes the Clean Water Fund resources that were specifically adopted to achieve clean water goals, yet as we approach the twenty year

mark of this voter approved initiative, the state is falling well short of meeting expected clean water outcomes with these funds. Now is the time to pivot allocation of these funds to better support those strategies capable of meeting water quality goals. Not only will this produce better, more durable results for our water, it will all shore up public support for the continuation of this funding in future years by demonstrating the state's ability to follow the science and take steps that will achieve water quality goals.

Support active measurement and tracking of CLC development

We support the draft NRS's commitment to develop new ways to track CLC acreage changes and to make this and other NRS data available on a central dashboard. Using currently available technology, the state should develop an annual CLC Index to track the CLC coverage over time. This will serve as a key source of information for farmers, researchers, government agencies, and the public.

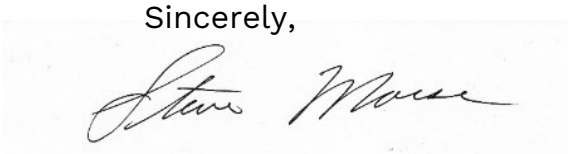
Support adoption of state nitrate standard for class II waters

We appreciate the State's commitment in the draft NRS to adopt nitrate standards to protect aquatic life in Class 2 waters. These streams and rivers have tremendous importance to ecological and public health. We hope that the MPCA will stay the course in finalizing years of work to develop and implement this standard.

Further, we support the Strategy's inclusion of measures to address pollution from other sources of nutrient pollution: feedlots, septic systems, forestry, and streambank erosion, including those recommendations included in the comment letter referenced in the second paragraph.

We recognize that the measures laid out in the nutrient reduction strategy will require expanded state strategies and commitments. We regard this as well worth the cost. Minnesotans and our downstream neighbors are currently facing the costs of decades of nitrogen and phosphorus pollution: in far too many communities, groundwater is unsafe, lakes are unfishable, and health costs are rising. We strongly encourage the MPCA and the State to adopt and prioritize measures to ramp up our nutrient pollution prevention efforts.

Sincerely,



Steve Morse
Executive Director

Submitted with the support of the organizations listed below:

Bicycle Alliance of Minnesota

Clean River Partners

Clean Water Action

Climate Land Leaders

Environmental Initiative

Friends of the Mississippi River

League of Women Voters Minnesota

League of Women Voters Upper Mississippi River Region Interleague Organization*

Minnesota Division Izaak Walton League of America

Minnesota Trout Unlimited

Minnesota Well Owners Organization (MNWOO)

MN350 & MN350 Action

Renewing the Countryside

Save Lake Superior Association

Save Our Sky Blue Waters

Vote Climate

**denotes non-MEP member*