

February 28, 2020

Re: Comments on proposed recommendations for nutrient pollution targets for the Red River

The Minnesota Pollution Control Agency (MPCA) would like to comment regarding the proposed targets and how they relate to the Minnesota's water quality goals.

The proposed nutrient concentration objectives for the Red River of the North are in alignment with our state adopted and USEPA approved eutrophication water quality standards and Minnesota's Nutrient Reduction Strategy. One of the overall objectives of Minnesota's strategy is to ensure the state is doing everything possible to reduce the impact of nutrients leaving Minnesota and flowing to Canada.

While Minnesota's River Eutrophication Standards (RES) do not include nitrogen, we recognize that nitrogen can contribute to eutrophication and downstream eutrophication challenges. Minnesota's Statement of Need and Reasonableness (SONAR) for our RES recognizes nitrogen as a nutrient that contributes to eutrophication.

Minnesota's RES are built on the model of a causal variable (phosphorus) and response (algal growth). However, that does not mean that a downstream phosphorus concentration goal, such as the one proposed for the Red River, is inappropriate or conflicts with Minnesota's RES.

While the phosphorus concentration objective recommended for the Red River was derived independently, it is equivalent to the phosphorus component of the Minnesota adopted RES for the Red River, 0.15 mg/L. With the phosphorus variable of RES equal to the concentration objective for the Red River at the Canadian border, the state-led implementation of the RES will also benefit downstream Lake Winnipeg.

The primary goal of the recommendation is to prevent further degradation and improve water quality. In other words, striving to meet the proposed concentration objective would protect the Red River from future impairment (it is not currently designated as impaired). In addition, it would reduce phosphorus loading to eutrophic Lake Winnipeg. These aims are consistent with Minnesota's Nutrient Reduction Strategy, and with state law.

As the MPCA feels the proposed objectives are consistent with state law and the goals for our Nutrient Reduction Strategy, we reaffirm our support for the proposed nutrient objectives.

Sincerely,



Katrina Kessler, P.E.
Assistant Commissioner

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