



June 22, 2026

Dear Members of the Minnesota Plumbing Board,

The Metropolitan Council is writing with regards to draft changes to MN Plumbing Code 4714.1501 and appreciates the opportunity to submit our comments to the board on these changes.

The Metropolitan Council is the regional policy-making body, planning agency, and provider of essential services in the seven-county Twin Cities metro area. Our mission is to foster efficient and economic growth for a prosperous region. The Metropolitan Council plays an important role in the region with regards to water. We provide wastewater service to over 110 communities in the region, treating on average 250 million gallons of water every day at our water resource recovery facilities. We also work with partners to protect, conserve, and utilize the surface and groundwater resources in the region. Guided by the [2050 Water Policy Plan](#), that was adopted by the Met Council last year, we work closely with our partners to develop and implement a regional watershed-based approach that addresses both improving impaired waters and protecting unimpaired waters.

The draft language being considered at your meeting this week includes language in 1501.1.1 regarding allowable use of alternate water that explicitly would not allow on-site treated non-potable water to be used for outdoor purposes and states that alternate water sources for non-potable applications cannot be stormwater.

The Met Council strongly supports stormwater reuse as a viable component of our sustainable water future and has engaged with many partners over the past several years to provide input and collaborate on how stormwater reuse can be done safely and in a way that adheres to local and state-wide guidance and regulation. The Met Council is concerned that this proposed draft language would remove any possibility of stormwater reuse systems, which is a strategy that has been promoted across the state for the past few decades. This language would negate a large portion of the actions in the 2050 Water Policy Plan and would specifically conflict with Policy #6 in our 2050 Water Policy Plan that states: "The Met Council works with partners to reduce barriers, pursue opportunities, and support efforts to reuse stormwater and wastewater, while balancing public and ecosystem health and financial viability."

Additionally, this year we intended to offer a stormwater reuse grant with a portion of the Clean Water Funds we received from the legislature to promote local implementation of stormwater reuse systems and to offset the cost of treatment of stormwater to meet log reduction targets for pathogens and water quality limits. If this language moves forward, those projects could be in conflict with the plumbing code and may not be able to be approved by local inspectors.

Thank you for your consideration of our concerns with the proposed changes to the plumbing code. We are available if you have any questions or would like to discuss these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Paske".

Sam Paske
Assistant General Manager, Environmental Services