



December 9, 2019

VIA E-MAIL AND U.S. MAIL

Chair Corwin
Commissioner Sission
Commissioner Yohe
International Joint Commission
U.S. Section
1717 H Street NW, Suite 835
Washington, DC 20006
United States

Chair Béland
Commissioner Lickers
Commissioner Phare
International Joint Commission
Canadian Section
234 Laurier Avenue West, 22nd FLR
Ottawa ON K1P 6K6
Canada

RE: Follow up on request for a public hearing on proposed numeric nutrient targets for the Red River proposed by the International Red River Board, IJC Reference 81R

Dear Chairs Corwin, Béland and Commissioners:

We are writing on behalf of the Minnesota cities of Breckenridge, Moorhead, Roseau, and Warroad to follow up on our letter sent October 16, 2019, requesting a hearing regarding the International Red River Board's ("IRRB" or "Board") proposed nutrient targets for the Red River of the North. Our communities care deeply about the health of the Red River and are supportive of the International Joint Commission's ("IJC" or "Commission") and IRRB's efforts to develop numeric nutrient targets and adaptive management strategies designed to protect the Red River. Our goal is to collaborate with the IJC to ensure that any nutrient targets developed for the Red River under reference 81R are scientifically sound and will be implemented in a comprehensive and strategic manner.

As a follow-up to our October 16, 2019 letter, our cities engaged Dr. Steven Chapra to provide his expert opinion on the scientific basis for the nutrient targets under consideration for the Red River. Dr. Chapra is an internationally renowned expert in water quality and has previously worked with the IJC on nutrient targets and control strategies for the Great Lakes.

We specifically selected Dr. Chapra because of his credibility with the IJC on issues related to nutrients in lakes and river systems. We asked Dr. Chapra to provide his independent assessment about: (1) the scientific methods used to develop the proposed nutrient targets at issue; (2) the validity of the concerns our consultant, Hall & Associates, previously identified on our behalf; (3) the findings of the Consensus Report completed by the IRRB; and (4) whether the nutrient targets under consideration are scientifically defensible based on existing work performed by the IRRB and its consultants.

Dr. Chapra's attached letter confirms that our concerns are valid and that there are fundamental flaws with the proposed nutrient targets. We request that you please carefully evaluate Dr. Chapra's letter and work with us to address these technical concerns in a transparent manner using the best available scientific methods. As indicated in our previous letter, we request the opportunity to meet with the IJC to address these concerns prior to any hearing in this matter and before the IJC forwards the proposed targets for consideration and approval by the signatories of the Boundary Waters Treaty.

Thank you for your attention to this important matter and we look forward to working with you in the future. To respond to this letter and coordinate the requested meeting, please contact our representative Daniel Marx at dmmarx@flaherty-hood.com or 651-259-1907.

Sincerely,

Renaë Smith, Breckenridge City Administrator
Christina M. Volkers, Moorhead City Manager
Jeff Pelowski, Mayor of Roseau
Bob Marvin, Mayor of Warroad

(Enclosure)

CC: Col. Karl Jansen, IRRB Co-Chair, U.S. Section
Mike Renouf, IRRB Co-Chair, Canadian Section
Jim Ziegler Co-Chair, IRRB Water Quality Committee
Rebecca Seal-Soileau, U.S. Co-Secretary, IRRB
Girma Sahlu, Canadian Co-Secretary, IRRB
Chuck Lawson, U.S. Section, Secretary, IJC
Frank Bevacqua, U.S. Section, Public Information, IJC
Susan Daniel, U.S. Section, Legal Advisor, IJC
Camille Mageau, Canadian Section, Secretary, IJC
Christine Blanchet, Canadian Section, Legal Counsel, IJC