



City of Thief River Falls

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February 25, 2020

VIA E-MAIL ONLY

International Joint Commission
U.S. Section
1717 H Street Northwest, Suite 835
Washington, DC 20006
bevacqauf@washington.ijc.org

RE: Comments on the International Red River Board's recommended nutrient concentration objectives and load targets for the Red River of the North.

Dear Commissioners:

Thank you for the opportunity to provide comments to the International Joint Commission ("IJC") on the on the International Red River Board's ("IRRB") proposed nutrient concentration objectives and loading targets for the Red River of the North. I am Brian Holmer, the Mayor for the City of Thief River Falls, Minnesota.

The City owns and operates a wastewater treatment plant that is regulated pursuant to a National Pollutant Discharge Elimination System ("NPDES") permit and discharges to the Red River of the North. The proposed nutrient concentration objective and load targets, if enforced by the Minnesota Pollution Control Agency ("MPCA") or U.S. Environmental Protection Agency ("EPA"), could require the City to make costly investments in process changes and/or infrastructure upgrades at our wastewater treatment plant ("WWTP").

Cities like Thief River Falls are on the forefront of protecting the Red River of the North and we take water quality concerns about the Red River and downstream Lake Winnipeg very seriously. Over the last 10 years, the City has made significant efforts to reduce our phosphorus contribution to the Red River. We support the IRRB's effort to develop a phosphorus load target designed to protect Lake Winnipeg and we urge the IJC to focus its effort on building consensus around the appropriate phosphorus load target for the Red River.

With respect to the proposed concentration objectives for phosphorus and nitrogen and the load target for nitrogen, the City is concerned that (1) these targets were largely developed without input from the local governments that stand to be impacted; (2) the targets conflict with Minnesota's adopted and U.S. EPA-approved River Eutrophication Standards and important related scientific findings; and (3) were developed without performing the scientific studies required to demonstrate that the targets are necessary and sufficient to protect the Red River or Lake Winnipeg. We know these concerns are shared by other Minnesota cities and municipal groups.

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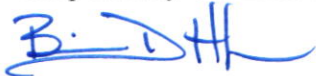
The potential financial costs of complying with the proposed phosphorus and nitrogen concentration objectives for the City and similarly situated communities are stark. The City currently owns and operates a pond wastewater treatment facility. We requested a preliminary analysis from our engineering consultant about what it would cost for our facility to meet the proposed phosphorus and nitrogen concentration objectives. Given the uncertainty related to how the concentration objective would apply to our specific facility, we assumed that our facility would be required to comply with both a total phosphorus limit of 1 milligram per liter (“mg/L”) and total nitrogen permit limits ranging of 10 mg/L.

Based on a preliminary evaluation, the cost to comply with both a total phosphorus limit of 1 milligram per liter (“mg/L”) could be as high as \$35,000,000. The cost to comply of a TN limit of 10 mg/L could be an additional \$5,000,000. This cost would be in addition to the cost for the City to meet its other infrastructure priorities necessary to protect public health and the environment. Those include aging force main replacements as well as inflow and infiltration rehabilitation and lift station maintenance.

Given the significant concerns identified by Minnesota cities and municipal groups and the potential economic consequences for municipal WWTPs, we believe that it is unreasonable for the IJC to accept the IRRB’s proposed concentration objectives for phosphorus and nitrogen and the load target for nitrogen at this time. Instead, we urge the IJC and IRRB to focus its efforts on the development of a phosphorus load target for the Red River designed to protect Lake Winnipeg, and to work with all stakeholders to develop a strategy to meet that target.

Thank you for your time and consideration of these comments.

Respectfully Submitted,



Brian Holmer
Mayor