

March 17, 2020

International Joint Commission  
U.S. Section  
1717 H Street Northwest, Suite 835  
Washington, DC 20006

**RE: Preliminary assessment of potential cost impact for the City of Breckenridge.**

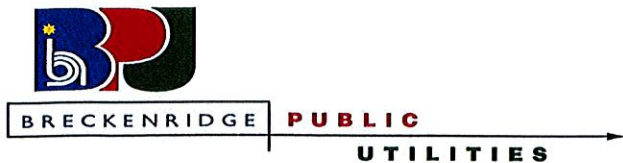
Dear Commissioners:

I am Neil Crocker, Director of Public Services for the City of Breckenridge MN ("City"). The City owns and operates a wastewater treatment plant that is regulated pursuant to a National Pollutant Discharge Elimination (NPDES) 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. EPA, could require the City to make costly investments in process changes and/or infrastructure upgrades or to make investments at our wastewater treatment plant ("WWTP").

Cities like Breckenridge 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 several years, the City has made significant efforts to reduce our phosphorus contribution to the Red River. We are also currently participating in the stakeholder process facilitated by the Basin Commission to work with other cities, agricultural groups and the state to develop strategies to protect water quality in 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.

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 retention pond wastewater treatment facility. We requested a preliminary analysis from Interstate Engineering regarding 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 limit ranging between 15 mg/L to 10 mg/L.

Based on a preliminary evaluation, the cost to comply with a total phosphorus limit of 1 milligram per liter ("mg/L") could be as high as \$7,200,000 for the mechanical plant plus \$1.20 per 1000 gallons operating costs. The cost to comply with a TN limit ranging between 15mg/l to 10mg/l is



very difficult to calculate, as nitrogen has never been tested and we have no comparison as to cost. But, with Breckenridge design flow of 500,000 GPD, the Engineering firm is estimating between \$5,500,000 and \$7,500,000 for a Nitrogen removal facility.

This would be an extremely significant cost for a very small load reduction to the system, and it would be in addition to the cost the City has already incurred by recently building a new potable water plant. Additionally, the City is in the process of implementing a multi-year 10.5 million dollar upgrade to our aging electrical infrastructure. Moreover, the City of Breckenridge recently completed a street condition evaluation which identified 5.1 million dollars in needed street repairs. These expenses are very burdensome on our community; however, the final results will be easily recognized improvements to the city in terms of both functionality and reliability.

It will be difficult to rally citizen support to spend an additional 12 to 15 million dollars on a mechanical plant to help reach these proposed TP and TN limits knowing that the end results will not be measurable even a few miles downstream from city limits.

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 their 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.

Sincerely,

A handwritten signature in black ink that reads 'Neil Crocker'.

Neil Crocker  
Director of Public Service