

## **ROCHESTER**



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DEPARTMENT OF PUBLIC WORKS 201 4th Street SE, Room 108 Rochester, MN 55904-3740 (507) 328-2400 FAX (507) 328-2401

March 17, 2017

Minnesota Management and Budget (MMB) 658 Cedar Street St. Paul, MN 55155

Attn: Mr. John Pollard,

Director of Legislative and Intergovernmental Affairs

Minnesota Management and Budget

cc: Mr. Jeff Ubl, PE

Senior Environmental Engineer

Barr Engineering Co.

Dear Mr. Pollard:

On February 23, 2017, the City of Rochester ("Rochester") received a portion of the "Engineering Cost Analysis of Current and Recently Adopted, Proposed, and Anticipated Changes to Water Quality Standards and Rules for Municipal Stormwater Systems in Minnesota," prepared by Barr Engineering, Inc., dated January 2017 and revised February 10, 2017 (the "Analysis"). The Analysis was required by the Minnesota State Legislature to evaluate financial and other impacts of recently adopted and anticipated future Minnesota water quality standards for five pollutants on Minnesota communities. Rochester was identified as a community to be studied in the legislation.

Rochester met with Barr representatives on October 12, 2016, to provide information for the Analysis. We heard nothing further about the Analysis, and Rochester was not given an opportunity to comment on any version or draft. Ultimately, we received the portion of the Analysis relating to Rochester's wastewater treatment facility on February 23, 2017.

Rochester understands that projecting the applicable water quality based effluent limits (WQBELs) for multiple pollutants, developing treatment alternatives for those limits, and estimating the costs of those alternatives is an extremely challenging undertaking for one wastewater treatment plant, much less for numerous plants throughout the State. We understand that such an effort requires that a number of assumptions be made and a limited array of factors be considered. Unfortunately, the limitations of such a wide-sweeping approach, with its inherent inability to address site-specific constraints, means that the true treatment costs can vary significantly from those estimated in the Analysis. Our evaluation of the true costs to Rochester suggests a larger economic hardship to its citizens than the Analysis presents.

Consequently, Rochester would appreciate the opportunity to comment on the Analysis and share with MMB and other constituencies, a cost assessment that takes into account the site specific constraints and technologies associated with its wastewater treatment plant and will be providing you with further information no later than April 10, 2017.

Yours truly,

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City of Rochester Mayor

Randy Staver

City of Rochester Council President

Richard Freese

City of Rochester Public Works Director

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