



CLEARWATER RIVER WATERSHED DISTRICT

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September 29, 2017

Minnesota Pollution Control Agency

C/O Justin Barrick

7678 College Road | Suite 105

Baxter, MN 56425

Dear Justin,

As you are aware, the Clearwater River Watershed District has been working on implementing its nitrogen mitigation and analysis plan for the Clearwater Harbor Wastewater Treatment Facility (SDS Permit #MN0065226) in order to comply with said permit requirements. Listed below is a summary of the various items completed in pursuit of plan completion.

Evaluation & design

- Alternative analysis performed to determine the most cost-effective option to meet the required total nitrogen limit
- Hydro-geotechnical analysis performed to better ascertain characteristics of the local hydrogeology and fate and transport between the facility's drainfields and the down gradient well. This included increased monitoring of GW004.
- Current system operation and subsurface conditions assessed to identify opportunities to optimize operations, said optimizations performed

Stakeholder engagement

- Multiple information sessions have been held (as evidenced by CRWD Board meeting minutes) to provide affected residents with information and gather feedback
- Multiple direct mailings to affected residents have occurred in an effort to keep said residents updated on the progression of the plan
- Multiple discussions on the plan at CRWD Board meetings to gather feedback and ensure adequate direction from the Board on plan completion
- Hosted a listening session where residents could voice concerns directly with their local legislators regarding this matter

Funding

- Applications to the state Public Facilities Authority's Point Source Implementation Grant (PSIG) Program submitted; Listing of project on state Project Priority List

- Discussions held on financing local share of projects cost via bonds through Stearns County as per MN watershed law (MN Statutes 103D), to be backed by special assessment on benefitted property owners

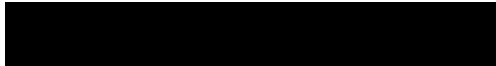
Currently, the design work for a nitrogen mitigation system is underway, slated to be completed by end of December 2017. Certified bids will be pursued shortly thereafter, with a goal of submitting the certified bids and corresponding documents to the MPCA no later than June 2018. Concurrently, the CRWD is moving forward with the necessary administrative/ legal work to construct the nitrogen mitigation system under MN Statutes 103D.635.

This project is currently second from last on the Point Source Implementation Grant (PSIG) program funding list for FY2018. Without the securing of grant funding, the system's costs are too great a burden for the benefitted property owners to bear. It is expected that the project will likely receive grant funding via the PSIG program for the FY2019 cycle. However, this means that construction, and subsequent system tuning to demonstrate "end-of-pipe" total nitrogen limits is met, will not occur until after the current SDS permit expiration date.

For the reasons noted above, we ask to begin the process to extend the permit expiration date, in regards to the total nitrogen limit. The CRWD has demonstrated its intent to comply with the limit, but is in need of additional time to secure funding necessary to finish implementation. Not knowing the best way to proceed with this request, it is hoped this letter is sufficient to start the process.

If you have any questions or comments on this matter, please contact me at the information provided above, or e-mail at: cole.loewen@crwd.org.

Best regards,



Cole Loewen
Administrator
Clearwater River Watershed District

Cc: Robert Schiefelbein, President, Clearwater River Watershed District
Eric Blasing, Engineer, Wenck Associates Inc.
Nicole Blasing, North Central Regional Unit Supervisor- Municipal Division, MPCA