



# Colorado Nutrient Coalition

Wastewater \* Stormwater \* *Representing* Water Conservation \* Agriculture \* Home Builders

October 14, 2011

Mr. Steven Gunderson  
Executive Director  
Water Quality Control Division  
4300 Cherry Creek Dr. South  
Denver, CO 802476-1530

Mr. Paul Frohardt  
Commission Administrator  
Water Quality Control Commission  
4300 Cherry Creek Dr. South  
Denver, CO 802476-1530

Re: Request for Cost Information Developed in Recent Cost- Benefit Report on Proposed Changes to Regulations 31 and 85

Dear Steve and Paul:

As you are aware, a major issue for the Colorado Nutrient Coalition has been the cost (and benefit) associated with mandating statewide nitrogen removal under Regulation 85. The draft report analyzed the cost of TN and TP reduction based on the type of technologies that would most likely be employed to achieve the suggested limits. However, the draft report only presented the total cost of the Division's initiative and did not include the information that would allow for the cost breakdown to be determined. We understand that the Division is not in favor of including this cost breakdown information in the report.

Regardless of whether or not the final Cost-Benefit Report is modified as our Coalition has requested, the public is vitally interested in the cost associated with the nitrogen removal component of the Division's proposal. Please provide us with copies of the cost breakdown, based upon the analyses CDM completed for the draft report. Your timely attention to this request is most appreciated.

Sincerely,

Nancy Keller for the  
Colorado Nutrient Coalition Members listed below:

Colorado Nutrient  
Coalition  
c/o Nancy Keller  
City of Pueblo  
Wastewater Dept.  
211 E. D Street  
Pueblo, CO 81003

Battlement Mesa Metropolitan District  
Bear Creek Watershed Association  
Cargill Meat Solutions  
Centennial Water and Sanitation District  
Central Grand Valley Sanitation District  
Chatfield Watershed Authority  
Cherokee Metro District  
City of Aurora Water  
City of Boulder  
City of Broomfield  
City of Brush  
City of Craig  
City of Ft Collins  
City of Grand Junction  
City of Greeley  
City of Lafayette  
City of Louisville  
City of Loveland  
City of Montrose  
City of Pueblo  
City of Rifle Utility Department  
City of Steamboat Springs  
City of Sterling  
Clifton Sanitation  
Colorado River Water Conservation District  
Colorado Springs Utilities  
Colorado Stormwater Council  
Colorado Wastewater Utility Council  
Donala Water and Sanitation District  
Frisco Sanitation District  
Forest Lake  
Ft. Morgan Wastewater  
Fountain Sanitation District  
Fremont Sanitation District  
Home Owners Association  
Littleton/Englewood WWTP  
Lower Fountain Metropolitan Sewage Disposal District  
Lower Fountain Water Quality Management Association  
Meeker Sanitation District  
Metro Wastewater Reclamation District  
Monument Sanitation District  
North Front Range Water Quality Planning Association  
Northern Colorado Water Conservancy District  
Norwood Sanitation District