June 10, 2024

Honorable Director Chris Dorrington
Department of Environmental Quality
Water Quality Planning Bureau
P.O. Box 200901
Helena, MT 59620

The Billings Chamber of Commerce stands opposed to the proposed nutrient rules for wastewater treatment.

The City of Billings already removes 90% of nutrients from wastewater, and recently announced significant improvements to its stormwater system to make it more sustainable. Furthermore, the City of Billings recently received LEED Gold certification—the only city in Montana—from the U.S Green Building Council, demonstrating the City's commitment to efficiency and environmental protection. Thus, the City has demonstrated that it can be relied upon as responsible steward of our shared environment without further outside regulation mandating that it take those steps.

Given the lack of existing technology to achieve the proposed numeric standards, and the very high standard to which the City of Billings already treats wastewater, the proposed change would require massive effort and funding for relatively little increase in environmental quality. Costly improvements like this will always come at the cost of other very important City—and business community— priorities. Public safety, important infrastructure projects, improvements to parks and trails, and even the City's ongoing efforts to make itself more efficient and environmentally friendly, would all be impacted by the budgetary constraints these new regulations would impose.

We strongly encourage you to reconsider this rule change.

Sincerely,

Daniel J. Brooks
Director, Business Advocacy
Billings Chamber of Commerce