



October 13, 2017

Department of Ecology
State of Washington

Re: Reclaimed Water Rulemaking

Public Utility District No. 1 of Clallam County (the District) submits the following comments on the Proposed Reclaimed Water Rule, Ch. 173-219 WAC (08-23-17 version). The comments are twofold: protection of ratepayers and protection of drinking water sources. Please note that the District supports the Washington Water Utility Council comments on the proposed rule. The last page of their comment letter includes a recommended new rule section: Interlocal Agreement with Affected Water Utilities. The District stands firmly behind this recommendation.

The District is concerned about the potential rate impact of proposed rule. Avoiding duplicative investments in infrastructure is important to the District. Reclaimed water that is intended to replace potable water for non-potable uses has great potential as a water conservation measure. However, the cost of duplicative purple pipe infrastructure and the loss of revenue to the water utility represent a double impact to the District and our customers. These potential impacts could be addressed and avoided through the process of negotiating an interlocal agreement between the water utility and the reclaimed water generator.

The District is concerned about unintended consequences of reclaimed water reuse on District public water supply wells. For example, reclaimed water has been proposed to be reused as shallow aquifer recharge for new water right mitigation purposes. The 2014 Carlsborg Sewer Facilities Plan prepared by Clallam County proposed this type of mitigation. This plan included a map of potential recharge sites. One of the sites is located within the 10-year travel time zone in the well head protection area surrounding one of the District's wells. Nitrate levels in nearby District wells are increasing. Sequim owns and operates a water reclamation facility. They own the reclaimed water that would be put into the recharge system. What if this recharge system is built near the PUD well and causes the nitrate concentration in the well water to exceed the maximum contamination limit? The District would incur increased costs for nitrate treatment and/or finding a replacement source of water. The interlocal agreement sounds like a way to properly coordinate and plan for the implementation reclaimed water reuse without adverse effects.

Thank you for the opportunity to comment on this proposed rule.

A handwritten signature in blue ink that reads "Tom Martin".

Tom Martin, P.E.
Water and Wastewater Systems Superintendent
Public Utility District #1 of Clallam County