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October 12, 2017

DEPARTMENT OF ECOLOGY

OCT 29 2017

Ms. Jocelyn Jones
Washington State Department of Ecology
PO Box 47600
Olympia WA 98504-7600

WATER QUALITY PROGRAM

Re: Reclaimed Water Rule Proposal WAC 173-219

Ms. Jones,

Sammamish Plateau Water and Sewer District is a Class A water purveyor located in King County. The District serves approximately 18,200 water connections and 11,850 sewer connections located in the Cities of Sammamish and Issaquah, and portions of unincorporated King County. In providing 1.8 billion gallons of potable water annually to our 65,000 customers, the District's primary source of water is groundwater (approximately 80%), with the balance coming from surface water through membership in the Cascade Water Alliance (CWA).

As a member of both CWA and Washington Association of Sewer and Water Districts (WASWD), the District has participated in drafting the comments submitted by these agencies, and supports the comments. As WASWD and CWA advocate our interests, please note our specific concerns include the following:

- The proposed rules fail to recognize potential adverse impact to groundwater sources presented by introduction of reclaimed water in the environment.
- The proposed rules fail to balance the interests of groundwater and aquifer protection with the interests of the generators and users of reclaimed water.
- The proposed rules fail to establish planning requisites for the generators of reclaimed water similar to those mandated to public water purveyors.
- The proposed rules fail to require the generators of reclaimed water to engage in appropriate planning and coordination with water purveyors to minimize or mitigate environmental and economic impacts to water purveyors.

The current rulemaking initiative has serious shortcomings. The predisposition to facilitate the use of reclaimed water should ensure the interests of groundwater and

water purveyors are balanced with the intent and convenience of the rules proposed for the generation and use of reclaimed water.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Krauss". The signature is fluid and cursive, with the first name being the most prominent.

John C. Krauss
General Manager

cc: Board of Commissioners
Chuck Clarke, Cascade Water Alliance
James Kuntz, Washington Association of Sewer and Water Districts

LL: 17-10-30