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October 15, 2019

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DEPARTMENT OF ECOLOGY

Water Quality Permit Coordinator  
Northwest Regional Office  
State of Washington Department of Ecology  
3190 160th Avenue SE  
Bellevue, WA 98008-5452

**Subject: Ecology's Preliminary Determination to Develop a Puget Sound Nutrients General Permit**

Dear Sir or Madam,

Thank you for the opportunity to comment on the Department of Ecology's proposal to prepare a general permit to address nutrient discharges from domestic wastewater treatment plants (WWTPs) that discharge to Puget Sound. On behalf of the Alderwood Water & Wastewater District (AWWD), we have co-signed a letter from a number of agencies who are interested in this matter, and our District supports the observations and recommendations contained in that letter.

AWWD is a special purpose district located in southwest Snohomish County. We provide potable water services to approximately 300,000 people and have some 40,000 connections to our wastewater collection system. The District owns and operates the Picnic Point Wastewater Treatment Plant; we also contract with King County to accept and treat about 65% of our wastewater, and with the City of Everett to handle about 4%. All these facilities send their treated effluent to Puget Sound. Our District has Puget Sound as its western boundary and our customers enjoy close visual, physical, and emotional connections to that body of water. As an agency and as a customer base, we have strong concerns about the health of the Sound and a desire to assure the long-term health of the marine life that depends upon it.

We understand that studies show problems with dissolved oxygen levels in certain parts of Puget Sound, and those levels are implicated in difficulties for marine life and in particular Chinook salmon and orcas. Ecology has expressed its belief that nitrogen and phosphate levels found in effluent from wastewater treatment plants are important contributors to the dissolved oxygen problem, and the Department has the intent of developing regulations that would limit such levels in effluent. We want to make several points about this approach:

- Not all treatment plants are designed the same, nor do they necessarily have similar nitrogen or phosphate releases.
- Such plants come in widely varying sizes, with very different quantities of effluent.
- Location of a wastewater plant, and where its outfall is situated in the Sound, is likely to have a major impact on the degree to which it affects the nutrient problem.
- Current designs and technology for reducing nutrient levels generally involve increasing in-facility residence time for wastewater, which generally means expanding the facility's footprint.

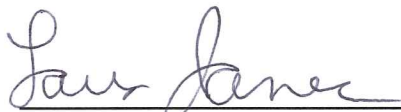
- In a number of cases (including our Picnic Point facility, as well as King County's West Point facility) treatment plants have been located on sites that were either small to start with, have been maximally built out, are constrained by terrain or other natural features, or some combination of the above.
- In cases such as Picnic Point where we have recently increased the handling capacity of the plant, it is likely that current readings of nutrient loading from the facility are relatively low due to having excess processing capacity given the influent flow. When flows increase to the projected levels, nutrient loading will rise. If Ecology's general permit places caps on plants at their current levels, we would not be able to route expected flows to Picnic Point and they would have to go elsewhere—at a point when other regional facilities may be facing capacity concerns due to such caps.

Given the above points, we urge the Department of Ecology to take a holistic approach to the nutrient problem and consider approaches that will create the greatest possible positive impact for the region's overall investment.

This also means that proposed solutions should have a high probability of meeting the ultimate goal of producing a positive change to the health of the Sound. Given the complexity of the natural and man-made processes, and the challenges of modelling the processes involved, that will not be easy, but it is vitally important to this effort and others in the region. While we agree that the health of Puget Sound is a vital matter for our ratepayers and for their descendants to whom we will pass this priceless treasure, this is not the only issue being confronted by the region, and many of them come with sizeable price tags. We want to be certain that requirements imposed upon our facilities have a high probability of making significant improvements to the nutrient situation, and that such improvements will in turn benefit the marine wildlife. Our ratepayers do not have unlimited political will or funds, and those seeking to protect and enhance the Sound cannot afford to pursue expensive proposals that are not likely to show significant results.

Thank you.

Sincerely,



Larry Jones  
AWWD Board President



Jeff Clarke  
AWWD General Manager