

Coalition for Clean Water

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Olympia, WA 98501

October 21, 2019

RECEIVED

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DEPARTMENT OF ECOLOGY

Heather Bartlett
Program Manager
Water Quality Program
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Re: Preliminary Determination to Develop a Puget Sound Nutrients General Permit

Dear Ms. Bartlett,

The Coalition for Clean Water (CCW) is an association of stormwater and wastewater treatment providers in Washington focused on promoting cost-effective use of public funds for the greatest protection of public health and the environment. Over the past year, many of our members have participated in the Department of Ecology's (Ecology) Puget Sound Nutrient Forums. Ecology staff also attended several CCW meetings to provide further details on the need for nutrient management of discharges to Puget Sound. Collectively, we share a vision of a healthy Puget Sound and continue to invest significant resources in protection and restoration towards this vision. Should Ecology choose to move forward with a Puget Sound Nutrients General Permit, we want to emphasize the importance of stakeholder engagement; additional modeling needed to determine the best solutions; a science and technical advisory group to advise Ecology; and increased funding to implement nutrient management.

Stakeholder Engagement with Ecology

Ecology's Puget Sound Nutrient Forums provided an informative general overview of the data and issues related to nutrients in Puget Sound. Stakeholders are seeking active engagement in developing a strategic approach to managing nutrients entering Puget Sound. Wastewater utilities, as active partners in the development of next steps towards a nutrient management plan, will provide Ecology with a better understanding of the challenges when implementing nutrient management and ensure that workable solutions and strategies are incorporated into any next steps. CCW suggests that a

Members:

King County
City of Seattle
City of Spokane
City of Tacoma
Pierce County
Spokane County
City of Everett
City of Lynnwood
City of Vancouver
Lakehaven
LOTT
City of Bremerton

representative group of wastewater utilities be convened to advise Ecology on the development of a nutrient management plan for Puget Sound.

Adequate Time for Implementation

The nutrient management plan process must include sufficient time for the water quality planning, monitoring, and modeling exercises necessary to quantify how nutrients influence water quality, as well as for forecasting conditions under future scenarios. Additional modeling is necessary to answer questions about potential actions utilities might take to mitigate or prevent impairments to Puget Sound, such as predicting the effectiveness of new technologies or adaptive management scenarios. The wastewater utilities seek to work collaboratively with Ecology on solutions with measurable outcomes that are informed by the Model and the underlying data.

Further, the most effective nutrient management strategies need to be investigated to ensure that investments in implementing nutrient reduction will be effective in producing the intended results. Wastewater utilities will require time to adequately analyze and plan for nutrient reduction at their facilities. Any required actions by utilities should foster not only full-scale nutrient removal treatment improvements, but also analysis of optimization opportunities within existing facilities, side-stream treatment options, and development and implementation of new technology. Provisions should be made for compliance schedules that extend over multiple permit cycles to support these efforts.

Form an Independent Science Workgroup to Advise Ecology regarding Nutrient Management

We also suggest the formation of an independent science and technology-based work group, similar to the San Francisco Estuary Partnership (Partnership). We believe the Partnership is a model that can be tailored to support a collaborative effort to gather and evaluate scientific data, frame modeling scenarios, and prioritize implementation strategies for Puget Sound. The workgroup should be a collaboration of local, state and federal agencies, non-governmental organizations, academia, and business leaders working to protect and restore the Puget Sound.

Funding and Other Incentives

We share Ecology's desire to invest our public resources wisely and ensure that expenditures are directly and effectively linked to measurable outcomes. Nutrient management is an expensive endeavor. Wastewater and stormwater utilities have an obligation to cost effectively use our ratepayers' funds to achieve measurable outcomes. Investments in Puget Sound should be focused on those efforts with the greatest potential to improve water quality. Ecology

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should support expanding the amount of State Revolving Loan fund available and by increasing grants and low interest loans to help wastewater and stormwater utilities mitigate the costs of nutrient reduction.

CCW members are looking forward to meeting with you again in the near future. We look forward to discussing how Ecology will engage affected stakeholders in the on-going development and implementation of the nutrient management process, and how we can best achieve a successful outcome for Puget Sound.

Sincerely,

A handwritten signature in blue ink that reads "Donald Seeberger". The signature is written in a cursive style with a long, sweeping underline.

Donald Seeberger
Executive Director
Coalition for Clean Water