

# Bruce Straughn

Heather Khan  
Washington State Department of Ecology  
Water Quality Program  
3190 160th Avenue SE  
Bellevue, WA 98008-5452  
Subject: Proposed Pilchuck River TMDL

Dear Ms. Kahn:

Thank you for the efforts of yourself and others in the development of the proposed Temperature and Dissolved Oxygen Total Maximum Daily Load Water Quality Improvement Report and Implementation Plan (TMDL) for the Pilchuck River located in Snohomish County. It is clear that the Pilchuck River is in need of protective and corrective measures to enhance the viability of migrating salmonids and other species.

I have read the proposed TMDL and supporting appendices, took copious notes, and intended to comment on many items that I felt could be worded differently or perhaps supported with additional data. In the end I have realized that the sum total of those comments would lead to very similar if not identical conclusions. So I will instead direct my comments on one statement which I believe is not accurate based on currently available information and a concern I have regarding financial equity.

First, Table 35 on page 96 indicates that effluent from the City of Granite Falls wastewater treatment plant could be percolated thru soil to reduce phosphorous discharges at an estimated cost of \$619,000. The city hired a consultant to investigate that option approximately 18-24 months ago. It is my understanding that the results of the study were that the option was not feasible due to existing soil conditions. Unfortunately that likely means that other, more costly, means of phosphorous removal would need to be implemented.

My main concern with the proposed TMDL is with the statement on page 95 that "The Granite Falls WWTP should be allowed two full permit cycles (~10 years) to complete the necessary treatment upgrades and optimize operations for phosphorus removal." I am unaware of any regulatory framework for this statement or financial analysis regarding the feasibility of completion within that timeframe.

The TMDL identifies approximately \$40.2 million in proposed watershed enhancements, with approximately one-half of that total (\$20.4 million) applied to upgrades at the city's wastewater treatment plant (WWTP). Table 34 on page 95 identifies timeframe goals for the water shed enhancements unrelated to the WWTP. These enhancements are proposed to occur over 45 years, with completion in 2066. It is also noted in the TMDL plan that the total benefits of those enhancements would not occur until possibly 50 years afterwards, correlating with the time for seedling trees to reach full canopy height.

Absent grants or legislative appropriation, costs for the treatment plant upgrade are borne by residents of the city, with a population of roughly 4,000. Costs for the other watershed enhancements are proposed to be borne by combinations of county wide funding sources (county population approximately 800,000) and state funding sources. The WWTP enhancements represent a burden on city residents of approximately \$5000 per capita. If we assume all the non-WWTP costs are paid by Snohomish County residents the total would be \$25 per capita. Compounding this enormous inequity is the proposed timeline of 10 years for completion of the WWTP upgrades, and

45 years for all other watershed enhancements.

These inequities in total costs and drastically varying timelines are further exasperated by the realities of economic demographics. The annual median household income in Granite Falls is approximately \$60,259, approximately 69% of the median for Snohomish County as a whole. Additionally, the poverty rate in Granite Falls is in the neighborhood of 11.5%, some 42% greater than the rate for Snohomish County.

It is also important to reflect on how the city has arrived in the position it now finds itself with regards to wastewater treatment. Our treatment plant is not an archaic relic from the days of the industrial revolution when treatment consisted of piping wastes to the nearest water body. It was constructed to produce effluent complying with the standards within WAC 173-221. That work, and subsequent upgrades, was completed with the review and approval of Ecology. In recent years Ecology has repeatedly recognized the city for the outstanding operation of the WWTP. The city now finds itself in a financially precarious situation after accommodating unprecedented growth as dictated by policy makers tasked with implementing legislated growth management requirements. In a nutshell, we build the WWTP we are required to build, operate it nearly flawlessly, accept more growth that many (likely most) residents desire, have that growth increase the pollutant levels from the WWTP, and then get hammered financially for the quantity of pollutants being released. None of this is intended to argue that the upgrades and enhancements in the TMDL plan are not warranted. However, the city is not solely responsible for the current state of the Pilchuck River and should not bear a disproportionate burden on the proposed corrective actions. Absent very significant, and at this time unidentified, sources of funding the proposed WWTP upgrades cannot occur in the timeline proposed.

I ask that the timeframe for required WWTP upgrades be revised to treat the residents of Granite Falls more equitably. Perhaps having a trigger that begins a timeline for WWTP upgrade completion once an agreed percentage of design and construction costs have been secured. There are likely legislative actions the city council could undertake to commit the city to pursuing funding for WWTP upgrades and to ensure that the proverbial "ball" is not dropped.

I am happy to discuss these concerns further and can be reached at 425-446-2678 or by email at [bruce.straughn@ci.granite-falls.wa.us](mailto:bruce.straughn@ci.granite-falls.wa.us).

Thank you for considering these comments.

Bruce A. Straughn

Councilmember, City of Granite Falls, Position #2

Heather Khan  
Washington State Department of Ecology  
Water Quality Program  
3190 160th Avenue SE  
Bellevue, WA 98008-5452

Subject: Proposed Pilchuck River TMDL

Dear Ms. Kahn:

Thank you for the efforts of yourself and others in the development of the proposed Temperature and Dissolved Oxygen Total Maximum Daily Load Water Quality Improvement Report and Implementation Plan (TMDL) for the Pilchuck River located in Snohomish County. It is clear that the Pilchuck River is in need of protective and corrective measures to enhance the viability of migrating salmonids and other species.

I have read the proposed TMDL and supporting appendices, took copious notes, and intended to comment on many items that I felt could be worded differently or perhaps supported with additional data. In the end I have realized that the sum total of those comments would lead to very similar if not identical conclusions. So I will instead direct my comments on one statement which I believe is not accurate based on currently available information and a concern I have regarding financial equity.

First, Table 35 on page 96 indicates that effluent from the City of Granite Falls wastewater treatment plant could be percolated thru soil to reduce phosphorous discharges at an estimated cost of \$619,000. The city hired a consultant to investigate that option approximately 18-24 months ago. It is my understanding that the results of the study were that the option was not feasible due to existing soil conditions. Unfortunately that likely means that other, more costly, means of phosphorous removal would need to be implemented.

My main concern with the proposed TMDL is with the statement on page 95 that *"The Granite Falls WWTP should be allowed two full permit cycles (~10 years) to complete the necessary treatment upgrades and optimize operations for phosphorus removal."* I am unaware of any regulatory framework for this statement or financial analysis regarding the feasibility of completion within that timeframe.

The TMDL identifies approximately \$40.2 million in proposed watershed enhancements, with approximately one-half of that total (\$20.4 million) applied to upgrades at the city's wastewater treatment plant (WWTP). Table 34 on page 95 identifies timeframe goals for the water shed

enhancements unrelated to the WWTP. These enhancements are proposed to occur over 45+ years, with completion in 2066. It is also noted in the TMDL plan that the total benefits of those enhancements would not occur until possibly 50 years afterwards, correlating with the time for seedling trees to reach full canopy height.

Absent grants or legislative appropriation, costs for the treatment plant upgrade are borne by residents of the city, with a population of roughly 4,000. Costs for the other watershed enhancements are proposed to be borne by combinations of county wide funding sources (county population approximately 800,000) and state funding sources. The WWTP enhancements represent a burden on city residents of approximately \$5000 per capita. If we assume all the non-WWTP costs are paid by Snohomish County residents the total would be \$25 per capita. Compounding this enormous inequity is the proposed timeline of 10 years for completion of the WWTP upgrades, and 45+ years for all other watershed enhancements.

These inequities in total costs and drastically varying timelines are further exasperated by the realities of economic demographics. The annual median household income in Granite Falls is approximately \$60,259, approximately 69% of the median for Snohomish County as a whole. Additionally, the poverty rate in Granite Falls is in the neighborhood of 11.5%, some 42% greater than the rate for Snohomish County.

It is also important to reflect on how the city has arrived in the position it now finds itself with regards to wastewater treatment. Our treatment plant is not an archaic relic from the days of the industrial revolution when treatment consisted of piping wastes to the nearest water body. It was constructed to produce effluent complying with the standards within WAC 173-221. That work, and subsequent upgrades, was completed with the review and approval of Ecology. In recent years Ecology has repeatedly recognized the city for the outstanding operation of the WWTP. The city now finds itself in a financially precarious situation after accommodating unprecedented growth as dictated by policy makers tasked with implementing legislated growth management requirements. In a nutshell, we build the WWTP we are required to build, operate it nearly flawlessly, accept more growth that many (likely most) residents desire, have that growth increase the pollutant levels from the WWTP, and then get hammered financially for the quantity of pollutants being released.

None of this is intended to argue that the upgrades and enhancements in the TMDL plan are not warranted. However, the city is not solely responsible for the current state of the Pilchuck River and should not bear a disproportionate burden on the proposed corrective actions. Absent very significant, and at this time unidentified, sources of funding the proposed WWTP upgrades cannot occur in the timeline proposed.

I ask that the timeframe for required WWTP upgrades be revised to treat the residents of Granite Falls more equitably. Perhaps having a trigger that begins a timeline for WWTP upgrade completion once an agreed percentage of design and construction costs have been secured. There are likely legislative actions the city council could undertake to commit the city to pursuing funding for WWTP upgrades and to ensure that the proverbial "ball" is not dropped.

I am happy to discuss these concerns further and can be reached at 425-446-2678 or by email at [bruce.straughn@ci.granite-falls.wa.us](mailto:bruce.straughn@ci.granite-falls.wa.us) .

Thank you for considering these comments.

Bruce A. Straughn

Councilmember, City of Granite Falls, Position #2