



**CITY OF KIRKLAND**

**Public Works Department**  
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*Comments are accepted through March 15<sup>th</sup> by mail or via the following online comment form (Ecology's preferred method): <http://wg.ecology.commentinput.com/?id=aiK7u>*

March 15, 2021

Ms. Eleanor Ott, P.E.  
Washington State Department of Ecology  
PO Box 47696  
Olympia, WA 98504-7696

RE: Department of Ecology's Puget Sound Nutrient General Permit

Dear Ms. Ott:

I am writing to share the City of Kirkland's concerns about the Washington State Department of Ecology's (Ecology) proposed draft Puget Sound Nutrient General Permit for municipal wastewater treatment facilities that discharge into Puget Sound.

The City of Kirkland has only been recently briefed by King County Department of Natural Resources and Parks (DNRP) and Wastewater Treatment Division (WTD), our partner and service provider, about these proposed regulations for nutrients. In fact, the first time we were made aware of any possibility of how these regulations may impact rates is as a footnote in King County's proposed 2021-2022 Budget. We are very concerned that these proposed regulations are not receiving sufficient review and study by all impacted stakeholders.

Kirkland urges Ecology to extend its nutrients general permit schedule to allow sufficient time to implement the following approach for improving water quality in the Sound:

- Establish an independent panel of scientists and engineers to make recommendations on the effectiveness of alternatives and identifying solutions that would achieve the greatest water quality benefit for the investment,
- Extend the nutrients general permit schedule to enable other alternatives (e.g., water quality trading and bubble permits), and
- Collaborate with interested parties to develop a regional plan that includes feasibility and affordability.

Kirkland relies on the King County WTD for wastewater treatment and disposal. For the average single-family ratepayer, that rate is currently \$540 per year. Initial estimates show profound rate increases to WTD's wholesale customers ranging from \$1,020 to \$5,148 per year to the average single-family rate payer by 2035. This is in addition to the baseline 5-7% per year increase scheduled for improvements, operations, and maintenance to meet current regulatory standards. These increases do not account for Kirkland's own operational and inflationary needs, and only apply to the Sewer utility. In a region already stricken by societal issues such as affordability, equity, and homelessness it is imperative that we step back to ensure the solutions exceed the investments.

Given the significant cost of imposing additional regulatory requirements, our region must be assured these investments will result in significant water quality improvements. Natural oceanic circulation into the Puget Sound accounts for 88 percent of the nitrogen inputs. Of the remaining 12 percent, wastewater treatment plants account for approximately 70 percent. Ecology's proposed draft nutrients general permit could require investing billions of dollars to reduce nutrient discharges from wastewater treatment facilities by even 30 percent. Is this the most cost-effective solution that will achieve our shared goal of making significant strides in improving Puget Sound water quality? What assurances can Ecology provide that this will achieve the region's goal of Puget Sound restoration?

There may be other, more cost-effective solutions to meet the low dissolved oxygen levels and we deserve to know what the best solutions are to restore Puget Sound. We owe it to the region's residents and Puget Sound to find the most cost-effective actions to provide the greatest water quality benefits.

Our residents are living in an economy already experiencing severe impacts from COVID-19. Adding additional cost burdens without fully exploring the most cost-effective solutions is problematic. We implore Ecology to recognize the affordability challenges near and long term for many residents in the Puget Sound region that will accompany the proposed regulations.

I want to thank you in advance for your consideration of our comments. If you have any questions, please feel free to contact me at [junderwood@kirklandwa.gov](mailto:junderwood@kirklandwa.gov) or at (425) 587-3802.

Sincerely,



Julie Underwood  
Director of Public Works

cc: Christie True, Director, King County Department of Natural Resources and Parks  
Mark Isaacson, Director, King County Wastewater Treatment Division  
Ray Steiger, Superintendent, Department of Public Works, City of Kirkland  
Josh Pantzke, Utility Manager, Department of Public Works, City of Kirkland  
Chris Lynch, Senior Financial Analyst, Department of Public Works, City of Kirkland