

# Fisherman Bay Sewer District

Please see attached file.

**Fisherman Bay Sewer District**  
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March 12, 2021

To Department of Ecology  
State of Washington

To Whom It May Concern:

The proposed limits, optimization and testing requirements are going to put the largest portion of the burden on the smaller facilities like mine who in fact are likely the smallest contributors to the problem. Being a STEP system (Septic Tank Effluent Pumping), we have a much lower BOD to TKN ratio which is going to make denitrification even more challenging and costly to a small organization like us. With a budget based on our small rate payer base – this puts a large portion of the burden of these additional costs onto a customer base with a mostly hardship status. Also, what is considered to be a small wastewater facility to you (under 3 MGD) is on a scale much larger than the average of .03 MGD that we currently process. I would recommend creating an even smaller designation that more accurately addresses the issues for plants our size - or offering some sort of variance for these more stringent requirements to relieve the burden being placed on our ratepayers. Another issue for us (that is related directly to a burden on our ratepayers) is the fact that we will need to outfit our lab with new and unfamiliar testing apparatuses and practices. This equates to potentially thousands of dollars of equipment and training or having to spend a significant amount of labor and effort on packaging, shipping, and paying another company to perform testing for us. With an operational staff of two (including myself) this is going to be quite a hardship on our organization. While we absolutely appreciate (and agree with) the efforts for keeping our waterways clean and healthy, there needs to be some consideration for the scale of the impact we create, and the efforts we are already putting forth to being ecologically driven.

Thank you for the opportunity to have our voice heard.

If there is anything further that you need or have any questions, please do not hesitate to contact me.

Sincerely,

Monico Mackinnon  
Superintendent  
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