

# Valley View Sewer District

Dear Ms. Ott:

I am writing to share the Valley View Sewer District's (District) 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 District is concerned that Ecology's proposed general permit will require significant investments with no assurances these investments will help achieve the region's goal of Puget Sound restoration. We owe it to the region's residents and Puget Sound to find the most cost-effective actions that will provide the greatest water quality benefits.

The District is a collection-only system and partners with three public agencies for wastewater treatment. The District is concerned its treatment providers have not been given adequate time to consider the future permit requirements and the costs associated with implementing new technology and equipment, if necessary. The District recognizes Ecology's responsibility to maintain compliance with water quality standards and to address dissolved oxygen (DO) impairment in sensitive areas of the Sound and encourages discussion with Cities and Districts that treat and discharge wastewater. While attending regional planning meetings, representatives of the District have been provided the following talking points we would like Ecology to consider.

We appreciate Ecology's efforts to examine how nutrients contribute to DO reductions and specifically anthropogenic sources of nutrient loading. There are, however, significant uncertainties and gaps in scientific information and disputed science regarding the relative impact of anthropogenic sources on DO levels. For example, there are many scientific uncertainties associated with understanding DO depletions in Puget Sound and the use of the Salish Sea Model (SSM) as the tool to support regulatory requirements. Additionally, Ecology has not fully considered the environmental trade-offs such as the increase in greenhouse gas emissions that occurs with increased nitrogen removal.

Given the significance of imposing additional regulatory requirements, our region must be assured that these investments will result in significant water quality improvements. Natural oceanic circulation 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 even reduce nutrient discharges from wastewater treatment facilities by 30 percent. This is not the most cost-effective solution and is very unlikely to achieve our shared goal of making significant strides in improving Puget Sound water quality.

Early modeling shows it will take a combination of non-point and point source to achieve meaningful reductions in nutrients. The region's wastewater utilities are committed to working with Ecology on watershed modeling and refinement of non-point source contribution of nutrients in Puget Sound. This technical information is necessary to build regional understanding and identify potential management actions related to non-point nutrient sources. 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.

Our residents are living in an economy already experiencing severe impacts from COVID-19, and adding additional cost burdens without fully exploring the most cost-effective solutions is very

problematic. Recognizing the affordability challenges both near and long term for many residents in the Puget Sound region, if Ecology proceeds with setting new standards, it should include other potential compliance options such as bubble permits or a regional water quality trading program, along with new governance structures to implement such approaches, which could prove to be less costly and more effective for improving water quality.

Finally, the District recommends that Ecology 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
- And collaborate with interested parties to develop a regional plan that includes feasibility and affordability.

I want to thank you in advance for your consideration of our comments. If you have any questions, please feel free to contact me anytime at (206) 242-3236 or [andrewl@valleyviewsewer.org](mailto:andrewl@valleyviewsewer.org).