

City of Renton

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

Dear Ms. Ott:

I am writing to share the City of Renton'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. 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 City of Renton owns and operates its own Wastewater Utility that collects and conveys wastewater to King County owned and operated treatment plants and associated infrastructure. The treatment and disposal of wastewater from Renton's 19,000 Wastewater Utility customers is provided by King County by agreement. Rate payers are responsible for paying King County to treat and dispose of wastewater originating from the city's Wastewater Utility service area customers. In addition to paying for wastewater treatment, Renton Wastewater Utility customers also fund the maintenance, operation, and capital improvement programs through Wastewater Utility rates. The Renton Wastewater Utility also maintains, operates, replaces, and improves the city's wastewater system that consists of 236 miles of sewer mains and 20 sanitary sewer lift stations. The funding is also used to conduct programs to reduce fats oils and grease (FOG) in wastewater and to reduce inflow and infiltration of non-wastewater into the Utility's conveyance systems. The proposed draft Puget Sound Nutrient General Permit would require a dramatic increase in treatment and disposal costs that would have to be paid by Renton Wastewater Utility customers through the King County Wastewater Treatment rates. This would restrict the City of Renton's ability to increase its Wastewater Utility rates, which would impact our ability to fund the maintenance, operation, and infrastructure replacements/improvements needed to meet future growth and serve our customers.

The King County South Wastewater Treatment Plant is located within the City of Renton. The proposed Puget Sound Nutrient General Permit would require significant wastewater treatment process improvements that could impact the residents and businesses within Renton due to odor, noise, and traffic resulting from the improvements and the new treatment process operations.

The City of Renton recognizes Ecology's responsibility to maintain compliance with water quality standards and to address dissolved oxygen (DO) impairment in sensitive areas of the Sound. The city is very concerned about the impacts of implementing new regulatory requirements in advance of verifying modeling results with sampling and data analysis, or fully exploring removal technologies' effectiveness and costs. Investments in nutrient control will have broad societal impacts on affordability, equity, energy use, and greenhouse gas emissions.

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 nutrient inputs. Wastewater treatment plants account for approximately only 8 percent of the total nutrient inputs to the Puget Sound. 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, or 2 percent of the total nutrient input. 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. It is incumbent upon Ecology to evaluate all nutrient inputs to develop the best solution economically and environmentally 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 City of Renton 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 Mpastucha@rentonwa.gov or by phone at 425-430-7311.

Sincerely,

Martin Pastucha
Public Works Administrator

cc: Mayor Pavone
Renton City Councilmembers
Ed VanValey, Chief Administrative Officer
Ron Straka, Utility Systems Director
Joe Stowell, Wastewater Utility Engineering Manager

Armando Pavone
Mayor



Public Works Department Martin Pastucha, Administrator

March 15, 2021

Eleanor Ott, P.E.
Washington State Department of Ecology
Post Office 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 Renton's concerns about the Washington State Department of Ecology's (Ecology) proposed draft language of the Puget Sound Nutrient General Permit for municipal wastewater treatment facilities that discharge into the Sound. The City is concerned that Ecology's proposed general permit will potentially 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 the environment to find the most cost-effective actions providing the greatest water quality benefits.

The City of Renton owns and operates its own Wastewater Utility that collects and conveys wastewater to King County owned and operated treatment plants and associated infrastructure. The treatment and disposal of wastewater from Renton's 19,000 Wastewater Utility customers is provided by King County through agreement. In addition to paying for wastewater treatment, Renton Wastewater Utility customers also fund the maintenance, operation, and capital improvement programs for 236 miles of sewer mains and 20 sanitary sewer lift stations. The proposed draft Puget Sound Nutrient General Permit would potentially require a dramatic increase in treatment and disposal costs that would have to be paid by Wastewater Utility customers through the King County Wastewater Treatment rates.

The City of Renton recognizes Ecology's responsibility to maintain compliance with water quality standards and to address dissolved oxygen (DO) impairment in sensitive areas of the Sound. The city is very concerned about implementing new regulatory requirements in advance of verifying modeling results with sampling and data analysis, or fully exploring removal technologies' effectiveness and costs. Investments in nutrient control will have broad societal impacts on affordability, equity, energy use, and greenhouse gas emissions.

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 new regulatory requirements, our region must be assured that these investments will result in significant water quality improvements. Natural oceanic circulation in the Puget Sound accounts for 88% of the nutrient inputs. Wastewater treatment plants account for approximately 8% of the total nutrient inputs to the Puget Sound. Ecology's proposed draft nutrients general permit could require investing billions of dollars to even reduce nutrient discharges from wastewater treatment facilities by 30%, or 2% of the total nutrient input. This does not appear to be the most cost-effective solution and is highly 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 control to achieve meaningful reductions in nutrients. The City of Renton and other 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. It is incumbent upon Ecology to evaluate all nutrient inputs to develop the best solution economically and environmentally 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, Ecology should proceed with caution in setting new standards. We would like consideration of 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 City of Renton 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 collaborate with interested parties to develop a regional plan that includes feasibility and affordability.

I want to thank you for your considering our comments. If you have any questions, please contact me at Mpastucha@rentonwa.gov or via phone at 425-430-7311.

Sincerely,



Martin Pastucha
Public Works Administrator

cc: Armondo Pavone, Mayor
Renton City Councilmembers
Ed VanValey, Chief Administrative Officer
Ron Straka, Utility Systems Director
Jason Seth, City Clerk
Joe Stowell, Wastewater Utility Engineering Manager
April Alexander, Executive Assistant
Judith Subia, Council Liaison
Julia Medzegian, Council Liaison

