



**Connected Community  
Enhanced Livability  
Environmental Sustainability**

August 10, 2021

M. Eleanor Ott, P.E.  
Water Quality Program  
Washington State Department of Ecology  
PO Box 47696  
Olympia, WA 98504-7696

Dear Ms. Ott,

I am writing to share our serious concern with the draft Puget Sound Nutrient General Permit. As a local agency contracting with King County for wastewater treatment and disposal, the City of Redmond is concerned for the following reasons:

- The amount of nutrient reduction imposed on wastewater treatment plants by the Draft Permit may have no measurable impact on dissolved oxygen levels in Puget Sound, given the size and natural variability of Puget Sound as compared to the discharges from those wastewater treatment plants,
- The modeling that Ecology used to conclude that nutrient reduction at the wastewater treatment plants would improve low dissolved oxygen in isolated parts of Puget Sound has not been confirmed, and should be peer reviewed and compared to other modeling efforts to confirm the model results,
- The cost of nutrient removal at the wastewater treatment plants may represent the single largest investment in water quality in a generation (5-10 times the cost of the Brightwater plant), resulting in significant increases to sewer rates impacting all of our rate payers, and
- There must be certainty that the required investment will actually meet the intended outcome and that there is not a more cost-effective way to achieve the same or a better outcome, given the significant investment for Permit compliance.

Likewise, the region must be able to comply with Ecology's Permit and still have the financial capacity to make investments to address all of the other requirements for a growing region, including a major update to King County's Wastewater Services Plan, stormwater management throughout the Puget Sound region (which left unaddressed will exacerbate the health of Puget Sound), capital updates to decades-old solid waste facilities, Metro Transit funding to increase service in an equitable manner for unmet needs, and significantly increasing affordable housing in a region that has become unaffordable for so many.

**City Hall**

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Rather than continuing down the current path, we would like to see Ecology step back and fully explore alternative approaches to reducing threats to dissolved oxygen in Puget Sound. In particular, Ecology should explore whether targeted investments closer to the problem areas in Puget Sound may support better outcomes than currently expected under the Permit.

Such a targeted approach is analogous to Redmond's approach to stormwater management. Redmond is committed to improving water quality locally and regionally. Redmond has joined other cities and counties in the region to make targeted investments that improve water quality, as a way of doing our part to improve Puget Sound. We have used a Watershed Planning approach to identify the needs of our streams and to identify where stormwater treatment or flow control improvements would be most beneficial. With a plan in place identifying the greatest needs, we are conducting pilot projects to demonstrate the success and cost-effectiveness of various stormwater management approaches.

This type of scientific and disciplined approach to increasing the health of our streams should be used by Ecology to address dissolved oxygen in Puget Sound, rather than using a one size fits all approach that may not achieve the desired outcome and will come at significant expense. A cost-benefit analysis must be conducted to assess how to best achieve Ecology's water quality goals.

Please take a step back in this process to consider the public comments you are receiving and revise your proposed approach to improving water quality in Puget Sound. Please provide opportunities for collaboration with local agencies and impacted stakeholders so we can all tackle this regional problem together.

We look forward to seeing such opportunities in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Angela Birney". The signature is fluid and cursive, with a prominent initial "A" and a stylized "B".

Angela Birney  
Mayor